Reform UK Evidence & Sources Compendium

Publication support volume • August 2026

Source registers, supplementary evidential material and further research questions supporting Funding, Governance and Public Accountability: An Evidence-Based Examination of Reform UK. Material is preserved here to make the report's evidential trail easier to inspect and reproduce.

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Part III — Funding and Transparency

3.1 — Source Register: Christopher Harborne: Funding, Access and Policy Intersections

- UK Parliament — Parliamentary Commissioner for Standards: current investigations and procedural protocol.
- Electoral Commission political finance records and the project's cleaned analytical dataset.
- Reform UK — published policy material.
- Financial Times — reporting on Harborne, Reform funding and related commercial interests.
- Reuters — reporting on Reform fundraising and cryptocurrency donors.
- The Guardian — reporting on the £5m gift, Harborne's background, crypto-policy links and related responses.
- Biteback Publishing — How to Launder Money: publisher description, authorship, purpose and publication details.
- Financial Times, 6 July 2026 — analysis of "The Art of the Bribe", Cottrell-funded support for Farage, and responses from Cottrell's lawyers and Reform.
- The Guardian, 14 February 2026 — London launch of How to Launder Money attended by Nigel Farage and other senior Reform figures.
- Companies House — company no. 11694875: historic Brexit Party/Reform corporate vehicle and previous company names.
- Companies House — Reform UK Party Limited, company no. 16260766: current company status and limited-by-guarantee structure.
- Electoral Commission — Reform UK registered political-party record (PP7931).

3.2 — Source Register: Ideological Money: Jeremy Hosking and Ben Delo

- Financial Times, "City financier Jeremy Hosking donates £125,000 to Reform UK", 24 June 2024
- Financial Times correction on Hosking four-point cultural pledge, 25 June 2024
- The Guardian, "Tory donor gives £200,000 to Nigel Farage's Brexit party", 11 May 2019

- The Guardian, “Reform UK reliant on leader Richard Tice for 80% of funding since 2021”, 13 May 2024
- The Guardian, “British crypto billionaire Ben Delo says he has given £4m to Reform UK”, 8 April 2026
- Reuters, “Crypto investors’ donations help Farage’s Reform UK lead fundraising race”, 4 June 2026
- US Department of Justice, Clemency Grants by President Donald J. Trump — Benjamin Delo entry, 27 March 2025 — https://www.justice.gov/pardon/clemency-grants-president-donald-j-trump-2025-present
- Reform UK, current policy programme
- Project Electoral Commission analytical dataset and Master Funding Evidence Workbook v3. [Internal project dataset; no public URL.]

3.3 — Source Register: Related-Party Finance: Richard Tice, Britain Means Business and TISUN

- Companies House — Britain Means Business Ltd (company no. 10893794): overview, officers and persons with significant control.
- Electoral Commission — Reform UK donation records, including TISUN Investments Ltd entries.
- Financial Times — “Reform UK raised even less in new funding than headline figures suggest”.
- Financial Times — “Reform repaid Tice loan on same day £1mn donated by mother of Farage aide Cottrell”.
- ITV News — Metropolitan Police investigation into Britain Means Business donations to Reform UK, 26 July 2026.
- The Guardian — reporting on Reform UK financial transactions, Cottrell-linked payments and source-of-funds scrutiny.

3.4 — Source Register: The Cottrell Network: Source of Funds, Access and the Criminal Investigation

- Metropolitan Police statement, quoted by ITV News and The Guardian — February 2025 referral, section 61 investigation, CPS advice, two interviews under caution and no arrests.
- Electoral Commission political-finance register — Reform UK donations attributed to Fiona Cottrell.
- The Guardian, 29 July 2026 — reported George-to-Fiona transfers totalling $2,047,693 and their timing relative to political payments.
- The Guardian, 9 July 2026 — police investigation, donor-permissibility dispute and Cottrell/Farage relationship.
- ITV News, 26 July 2026 — police examination of the two Britain Means Business £250,000 donations and responses from Tice/Reform.
- The Guardian / Sunday Times reporting, July 2026 — Cottrell-funded accommodation, security, staffing and Farage access.
- US federal court reporting / 2017 contemporary coverage — Cottrell wire-fraud plea, dismissed counts and eight-month sentence.

- Political Parties, Elections and Referendums Act 2000, section 61 — evasion of restrictions on donations.

3.5 — Source Register: The Funding Architecture: What the Networks Show Together

- Electoral Commission — Reform UK political-finance records and Q1 2026 party-donation statistics.
- Project Master Funding Evidence Workbook — cleaned donation dataset spanning the political continuity from the Brexit Party to Reform UK, with donor-concentration analysis. [Internal project dataset; no public URL.]
- Reuters, 4 June 2026 — Reform fundraising led by crypto investors Christopher Harborne and Ben Delo.
- Financial Times, August 2026 — Britain Means Business, TISUN loan repayment/conversion and Fiona Cottrell transaction reporting.
- The Guardian, July–August 2026 — Cottrell transfer chronology, Reform financial-network reporting, access/benefits and NCA-related scrutiny.
- Companies House — Britain Means Business and TISUN control/ownership records.
- Political Parties, Elections and Referendums Act 2000 — political-donation restrictions and section 61.

3.6 — Source Basis: Evidence Audit and Visual Funding Map

Publication note

The registers below are organised by the final report section they support. Synthesis sections may draw on evidence already listed in preceding registers rather than duplicate the same sources.

Part III — Supplementary evidential material

Part IV — Governance, Councils and Organisational Control

Section-level source registers and supplementary evidential material supporting Part IV.

4.1 — Source Register: Democratised — But How Democratic?

- Reform UK Constitution — Articles III–VIII and XII; official PDF currently available through Reform UK web infrastructure.
- Companies House — Reform UK Party Limited, company no. 16260766; current corporate status.
- Companies House — Reform 2025 Ltd, company no. 11694875; historic corporate vehicle and current control records.
- Reform UK — February 2025 statement announcing transfer from shareholder structure to non-profit company limited by guarantee.

- Reform UK — Party Board Election rules, 2025.
- Reform UK official website — current leadership and membership claims (270k+ members).
- Sky News, 20 February 2025 — contemporaneous analysis of the new constitution and member powers.
- Reuters, 10 June 2025 — David Bull appointment and contemporary discussion of internal tensions.
- BBC News, January 2025 — Derbyshire councillor resignations alleging increasingly autocratic leadership, with Farage's response.

4.2 — Source Register: Control in Practice: Dissent, Discipline and the Farage Leadership Model

- Reform UK Constitution — Articles VI, X and XI: leadership, Board, discipline, natural justice, sanctions and appeals.
- Crown Prosecution Service, 14 May 2025 — Decision not to charge former Reform UK MP in relation to alleged threats; evidential test not met.
- The Guardian, 7 March 2025 — Reform statement removing Rupert Lowe's whip, bullying complaints, alleged threats and Lowe's response.
- The Guardian, 25 March 2025 — Jacqueline Perry KC report on workplace bullying/harassment complaints and Lowe's rejection of findings.
- The Guardian, 30 April 2025 — legal actions arising from the Lowe dispute and publication of the internal report.
- The Guardian, 10 January 2025 — Derbyshire Reform councillor resignations and allegations concerning Farage's leadership.
- Reuters, 7 June 2025 — Zia Yusuf's return to Reform two days after resigning and his reassigned responsibilities.
- Reuters, 10 June 2025 — appointment of David Bull as Reform Chairman amid internal tensions.
- The Guardian, 1 February and 5 July 2025 — James McMurdock conviction/vetting response and later self-suspension of the whip over separate business allegations.
- The Guardian, March–May 2026 — candidate suspensions and post-selection vetting controversies involving Stuart Niven, Chris Parry, Stuart Prior and others. [Composite reporting across multiple articles; individual citations are identified in the main report.]
- The Guardian, 29 July 2026 — charge against Glenn Gibbins following earlier Reform suspension and reinstatement; charge not conviction.
- Reform UK official website, August 2026 — current senior leadership positions.

4.3 — Source Register: Growth Without Infrastructure? Candidates, Councillors and Organisational Capacity

- Reform UK Constitution — candidate approval, branch, discipline and central governance provisions.
- Reform UK official website, August 2026 — current party claims concerning membership and councillor scale.

- ITV News Central, 27 March 2026 — suspension of Staffordshire councillor Lynn Dean and Reform's statement that an account had not been disclosed during vetting.
- ITV News Central, 6 December 2025 — expulsion of Staffordshire council leader Ian Cooper following allegations concerning historic social-media material.
- ITV News Anglia, 11 May 2026 — Stuart Prior resignation, membership revocation and Essex election context.
- ITV News Tyne Tees, 12 May and 11 June 2026 — Glenn Gibbins suspension and subsequent reinstatement/final warning.
- ITV News West Country, 12 May 2026 — suspension of newly elected Plymouth councillor Ben Rowe pending investigation.
- The Guardian, 11 May 2026 — Stuart Prior case and wider post-election scrutiny of Reform candidate histories.
- The Guardian, July 2026 — Glenn Gibbins criminal charge; charge not conviction.
- The Guardian, January 2025 — Reform branch/vetting dispute surrounding Derbyshire resignations and Farage's response.
- Contemporary local-election reporting — Reform council gains in Sunderland, Essex and elsewhere; exact national councillor total reserved for independent reconciliation. [Composite reporting; no single source URL.]

4.4 — Source Register: The First Test of Government: What Happened in Reform-Run Councils?

- Kent County Council — 2025/26 Quarter 2 Revenue and Capital Budget Forecast Outturn Report and Cabinet minutes, November 2025.
- Kent County Council — 2025/26 Revenue and Capital Budget Monitoring Outturn and Cabinet decision, June 2026.
- Kent County Council — 2026/27 Budget Book, budget announcement and March 2026 late-funding decision.
- Kent County Council — Savings and Reinvestment Initiatives; DOLGE update, 3 February 2026; response concerning £39.5m future-spend figure, 11 February 2026.
- Kent County Council — committee restructure and £75,000 annual saving proposal/decision.
- Staffordshire County Council — 2026/27 budget material, council-tax information and January/February 2026 efficiency statements.
- KPMG — Staffordshire County Council Auditor's Annual Report 2024/25: financial sustainability, outturn and reserves baseline.
- Derbyshire County Council — Revenue Budget 2026/27 and 13 February 2026 budget announcement.
- Derbyshire County Council — January 2026 savings-plan and budget-pressure material.
- Government/council announcements, July 2026 — local-government reorganisation decisions for Kent, Staffordshire and Derbyshire.

4.5 — Source Register: The Attrition Audit: What Actually Happened to Reform's Councillors?

- Essex County Council, 8 May 2026 — Reform gained control with 53 seats.

- ITV News Anglia, 11 May 2026 — Stuart Prior membership revoked and resignation from Essex and Rochford seats.
- ITV News West Country, 27 October 2025 — five Cornwall councillors left Reform; group fell from 28 to 23.
- Cornwall Council — official political breakdown, updated 21 May 2026, listing 21 Reform councillors.
- The Guardian, 27 October 2025 — Kent expulsions of Robert Ford and Bill Barrett and status of Reform group.
- ITV News Meridian, 28 October 2025 — further Kent expulsions and report that fewer than 50 Reform councillors remained.
- The Guardian, 6 November 2025 — Isabella Kemp suspension; nine of the original 57 Kent Reform councillors reported lost from the group.
- ITV News Central, 5 December 2025 — Staffordshire leader Ian Cooper's Reform membership revoked.
- ITV News Central, 27 March 2026 — Lynn Dean suspended pending investigation.
- ITV News West Country, 12 May 2026 — Ben Rowe suspended pending investigation after Plymouth election.
- ITV News Tyne Tees, 11 June 2026 — Glenn Gibbins reinstated after internal disciplinary process and issued final warning.
- The Guardian, 29 July 2026 — Glenn Gibbins charged over an allegedly grossly offensive post; charge is not conviction.

4.6 — Source Register: From Attrition to Administration: Does Churn Affect Council Performance?

- Staffordshire County Council — New Acting Leader, 9 December 2025
- Staffordshire County Council — New Reform UK Group Leader, 17 March 2026
- Staffordshire County Council — New Cabinet Member, 31 March 2026
- Essex County Council — Reform UK gains control, 8 May 2026
- Essex County Council — Rayleigh West by-election and updated composition, 19 June 2026
- ITV News — Cornwall Reform group leader resigns, 13 October 2025
- ITV News — Five ex-Reform Cornwall councillors, 27 October 2025
- Cornwall Council — Political breakdown, updated 21 May 2026
- Kent County Council — Scrutiny Committee, 25 November 2025
- Kent County Council — Committee restructure, 9 December 2025
- Kent County Council — Cabinet reshuffle, 30 March 2026
- Kent County Council — Cabinet changes, 23 May 2026

4.7 — Source Register: Governance Scorecard: Is Reform Institutionally Ready for National Government?

- Reform UK — Constitution (current constitutional framework; party/company status, Board, leader, membership and branch provisions).
- Reform UK — Party Board Election (three member-elected positions and description of Board as principal management and administrative authority).

- Reform UK — Resolution adopting the reformed constitution and democratisation framework.
- Reuters — Reform's Scotland/Wales governing-readiness test and 2026 candidate-vetting withdrawals, 5 May 2026.
- Reuters — Reform's local-authority test, council governance and professionalisation, 29 October 2025.
- Reform UK — Zia Yusuf: "We'll stop the boats in our first year", including claim of thousands of pages of primary legislation, 30 June 2026.
- Reform UK — Zia Yusuf identified as Shadow Home Secretary, 22 July 2026.
- Kent County Council — Council Tax 2026/27 and 3.986% increase.
- Kent County Council — 2026/27 budget, including adult social care and children's services allocations.
- Kent County Council — DOLGE update distinguishing savings, reprofiled potential spend and debt reduction, 3 February 2026.
- Staffordshire County Council — New Acting Leader, 9 December 2025.
- Staffordshire County Council — New Reform UK Group Leader, 17 March 2026.
- Staffordshire County Council — New Cabinet Member, 31 March 2026.
- Cornwall Council — Political breakdown, updated 21 May 2026.
- ITV News — Five ex-Reform Cornwall councillors and reasons for departure, 27 October 2025.

Part V — Operational and Legal Feasibility

Section-level source registers and supplementary research material supporting Part V.

5.1 — Source Register: From Promise to Statute: A Policy Feasibility Audit

- Reform UK — Policies: Operation Restoring Justice, Stop the Boats and Secure and Defend Our Borders.
- Reform UK — Zia Yusuf: "We'll stop the boats in our first year", 30 June 2026.
- Reuters — Reform UK proposes military-led Operation Fortress in the Channel, 3 August 2026.
- Reuters — Farage sets out mass-deportation plan, detention estate and return-agreement proposals, 23 August 2025.
- Reuters — Reform policy platform, including up to 600,000 deportations over five years, 17 March 2026.
- Home Office — Immigration system statistics, year ending March 2026.
- Home Office — How many people are returned from the UK? Year ending March 2026.
- Home Office — Small-boat asylum claims and outcomes, updated 16 July 2026.
- Home Office — UK-France Agreement transfers and returns to 30 June 2026.
- Home Office — Country returns guide, updated 6 July 2026.
- Home Office — Detention expansion and removal programme, 29 June 2026.
- House of Commons Library — The European Convention on Human Rights and the Human Rights Act 1998, 2 June 2026.

- European Court of Human Rights — Official Convention text; Article 58 denunciation procedure.
- UNHCR — Refugee Convention text; withdrawal/denunciation provision.
- UN Committee against Torture — General Comment No. 4 on Article 3 non-refoulement.
- UK Parliament — Parliamentary sovereignty.
- Home Office — Border Security, Asylum and Immigration Act 2025.

5.2 — Source Register: The £42 Billion Question: Costing Mass Deportation

- Reform UK — Policies: Operation Restoring Justice; 24,000 detention capacity, five daily flights and £42bn ten-year net-saving claim.
- Reform UK Oxfordshire — Operation Restoring Justice: approximately £10bn five-year gross implementation cost and £7bn-per-year "status quo" claim.
- The Times — Reform UK will pledge five deportation flights a day: reported £10bn cost breakdown, voluntary-return offer and operational assumptions.
- Home Office — Average cost of an Immigration Enforcement return FY 2024 to 2025, 9 March 2026.
- Home Office — Immigration system statistics, year ending March 2026: returns.
- Home Office — Immigration system statistics, year ending March 2026: asylum support population.
- Home Office — Asylum seekers will pay towards costs of accommodation, 30 June / 2 July 2026: £144 hotel and £23.25 dispersal cost estimates.
- National Audit Office — Investigation into the costs of the UK-Rwanda Partnership: fixed payments, per-person payments and £11,000 flight assumption.
- National Audit Office — The Home Office's asylum accommodation contracts: hotel share of contract costs and accommodation-contract evidence.
- Home Office — Immigration Removal Centre Expansion Programme Accounting Officer Assessment: 1,000-bed expansion, whole-life-cost methodology, risk and optimism bias.
- Home Office — Campsfield immigration removal centre factsheet: 160 Phase 1 beds and planned 400-bed total.
- Contracts Finder — Haslar IRC Operator Service: £110m initial operator-services procurement and scope.
- UK Parliament — Immigration Removal Centres written answer, 13 November 2025: factors governing detention capacity and 1,000-bed expansion.
- Home Office — Illegal immigrants and foreign criminals to be removed, 29 June 2026: detention expansion and projected removals.

5.3 — Source Register: The Throughput Problem: Can the State Physically Remove 600,000 People?

- Reform UK — Policies: Operation Restoring Justice; up to 600,000 removals, 24,000 detention capacity and up to five deportation flights per day.
- Home Office — How many people are returned from the UK? Year ending March 2026: 39,007 total returns, 9,723 enforced and 29,284 voluntary.
- Home Office — How many people are detained under immigration powers? Year ending March 2026: detention entries, snapshot population and detention-duration evidence.

- Home Office — Arranging removal: caseworker guidance, updated March 2026; removal criteria, charter documentation, complex cases, escorts, cancellation and failed-removal procedures.
- Home Office — Country returns guide, updated 6 July 2026; documentation requirements and destination-specific return constraints.
- Home Office — Travel documents for return: countries guide, July 2026 dataset.
- Home Office — Illegal immigrants and foreign criminals to be removed, 29 June 2026: current detention expansion, workforce increase and enforcement-budget plans.
- Home Office — Immigration offenders returned on flight to Nigeria and Ghana, 25 April 2025: 43-person charter and international-cooperation example.
- Home Office — Criminals and immigration offenders removed on charter flight, 25 July 2024: 46-person Vietnam/Timor-Leste charter.
- Home Office — Immigration system statistics data tables, year ending March 2026: detention and returns datasets.

5.4 — Source Register: The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

- Reform UK / Operation Fortress reporting — Reuters, 3 August 2026: Royal Navy interception proposal, return to France and two-week claim.
- UK–France Agreement on the Prevention of Dangerous Journeys — treaty text and explanatory material; entered into force 6 August 2025.
- Home Office — Transfers into and returns from the UK under the UK–France Agreement, 6 August 2025 to 30 June 2026: 1,117 IN and 1,087 OUT.
- UK Parliament — Written answer, 13 July 2026: UK–France returns pilot extended to October 2026 and more than 1,000 returns.
- House of Commons Library — Brexit: the end of the Dublin III Regulation in the UK, 21 December 2020.
- Home Office — User guide to immigration statistics: post-2021 inadmissibility and safe-third-country return subject to that country's agreement.
- Home Office — Country returns guide, updated 6 July 2026.
- Home Office — Travel documents for return: countries guide, July 2026; Afghanistan, Eritrea and country-specific documentation constraints.
- UK–Albania Joint Communiqué — bilateral cooperation on security, illegal migration and returns, 13 December 2022.
- Home Office — Milestone reached in UK–Albania agreement on illegal migration, 25 April 2023: more than 1,000 returns after the communiqué.
- Prime Minister's Office — Plan to stop the boats update, 5 June 2023: more than 1,800 Albanian returns on weekly flights since December.
- Home Office — UK–France Joint Action Plan on illegal migration across the Channel: Sandhurst framework and bilateral cooperation.
- Home Office — Joint UK–France Coordination and Information Centre in Calais: 24/7 operational cooperation under the Sandhurst Treaty.
- Guardian — French officers halted small boats at sea on ten occasions since spring 2026; current operational intervention evidence.

- Guardian — Feasibility analysis of Operation Fortress, 3 August 2026; French consent, maritime and diplomatic issues.

5.5 — Source Register: Operation Fortress at Sea: Interception, Rescue and the Law of the Channel

- Reform UK / Operation Fortress — Guardian, 3 August 2026: proposal and retired Commander Tom Sharpe's direct criticism.
- UK Parliament Defence Committee — Operation Isotrope: the use of the military to counter migrant crossings, March 2022.
- UK Parliament — Operation Isotrope oral evidence, 26 January 2022: Vice-Admiral Sir Charles Montgomery and Commander Tom Sharpe.
- UK Parliament — Operation Isotrope written evidence: Admiral Sir George Zambellas and other witnesses.
- UK Parliament — Ministry of Defence written answer, 29 November 2022: Royal Navy would not implement or assist turnaround tactics under Defence primacy.
- UK Parliament — Home Office written answer, 28 November 2022: turnaround possible only in limited circumstances because safety of life at sea takes priority.
- United Nations — UNCLOS Part VII, Article 98: duty to render assistance to persons in danger at sea.
- International Maritime Organization — International Convention on Maritime Search and Rescue (SAR): rescue coordination and safe-disembarkation framework.
- International Maritime Organization — Revised Rescue at Sea Guide launched May 2026: rescue and safe disembarkation of refugees and migrants.
- IMO — Guidelines on the Treatment of Persons Rescued at Sea (MSC.167(78)): place-of-safety and disembarkation principles.
- Independent — September 2025: former First Sea Lord Admiral Lord West on the limits of naval deployment without return capability.
- Guardian — 4 August 2026: 173-person dinghy capsized after engine fire, illustrating rapid transition from crossing to mass-rescue incident.

5.6 — Source Register: The Detention State: Building and Operating 24,000 Secure Places

- Reform UK — Zia Yusuf: "We'll stop the boats in our first year"; commitment to around 24,000 detention spaces, Deportation Command and returns agreements.
- UK Parliament — Immigration Removal Centres: Costs, answered 10 June 2025; national detention capacity approximately 2,480 beds.
- Home Office — Immigration detention statistics, year ending March 2026; 1,955 people held under immigration powers at 31 March 2026.
- UK Parliament — Campsfield and Haslar estimated capital and operating costs, answered 2 November 2022; £90m–£100m Campsfield, £150m–£160m Haslar, excluding inflation, optimism bias and contingency.
- Contracts Finder — Campsfield House and Haslar IRC procurement; planned capacities of 400 and 600 and estimated operator-contract values of £170m and £229m.

- Home Office — Campsfield IRC factsheet; Phase 1 opened with 160 beds and Phase 2 planned to add 240.
- Hansard — Campsfield Immigration Removal Centre opening statement, December 2025; healthcare procured by NHS England and 160-bed Phase 1.
- Planning Inspectorate — Campsfield Phase 2 Crown development application, accepted June 2026.
- UK Parliament — Campsfield Phase 2 costs, answered 25 June 2026; construction cost not yet finalised and subject to Treasury Full Business Case approval.
- Home Office — Illegal immigrants and foreign criminals to be removed, 29 June 2026; Haslar/Campsfield expansion to 1,000 beds and 40% increase in detention capacity.
- Contracts Finder — Haslar IRC operator service PIN; management, security, welfare, escorting, hospital bed watches, furniture, facilities management and cleaning.
- HM Inspectorate of Prisons — Harmondsworth IRC progress review, 2025; doubled staffing and substantial investment following severe 2024 findings.
- Home Office — Immigration detention demand and Campsfield planning need, parliamentary answer 25 June 2026.

5.7 — Source Register: Finding 600,000 People: Deportation Command, Raids and the Surveillance State

- Reform UK — Operation Restoring Justice PDF: UK Deportation Command, Illegal Migrant Identification Centre, automatic data sharing, bulk warrants and mandatory biometric capture proposal.
- Home Office — Immigration Enforcement raids reach highest level in history, 13 January 2026: 17,400+ business visits and 12,300+ arrests.
- Home Office — Enforcement visits guidance, updated May 2026: planning, authorisation and conduct of immigration-enforcement visits.
- Home Office — Warrants: procurement and use, updated May 2026: judicial warrant purposes, application and execution.
- Home Office — Immigration Enforcement powers: administrative powers for removal and officer powers/constraints.
- Home Office — Retention and usage of biometric information, February 2026: fingerprints, facial images, identity assurance and permitted uses.
- Home Office — Live facial recognition in Immigration Enforcement collection: watchlists, deployments, policy and legal documents.
- Home Office — Live facial recognition deployment in November 2025: Immigration Enforcement operational deployment data.
- Information Commissioner's Office — March 2026 analysis of facial recognition governance, accuracy and bias risks.
- Information Commissioner's Office — December 2025 statement concerning historic bias in the Police National Database retrospective facial-recognition algorithm.
- Home Office — Ask the Home Office to check your immigration status is correct, updated April 2026.
- Home Office — eVisa error reporting: wrong personal details or immigration status and technical errors.

- Home Office — Windrush Lessons Learned Review by Wendy Williams and subsequent progress/revisit material.
- Home Office — Windrush Lessons Learned Review progress update: data gaps, casework and continued risk of erroneous enforcement consequences.
- Home Office — Response to inspection on overstayers, 2026: current Immigration Enforcement focus and contemporary enforcement activity.

5.8 — Source Register: Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person

- Reform UK — Operation Restoring Justice PDF: explicit proposal for detention power without Hardial Singh constraints, detention until deportation and "no more bail".
- Home Office — Detention and case progression review, updated 15 June 2026: Hardial Singh principles, realistic prospect of removal and effect of section 12 of the Illegal Migration Act 2023.
- Home Office — Detention: general instructions, updated 15 June 2026: legality, purpose, proportionality and continued detention.
- Illegal Migration Act 2023 — section 12: statutory provisions on the period for which persons may be detained.
- Immigration Act 1971 — Schedule 2 detention powers pending examination and removal.
- Supreme Court — B (Algeria) v Secretary of State for the Home Department [2018] UKSC 5: loss of realistic removal prospect and limits on immigration detention.
- Supreme Court — R (Lumba) v Secretary of State for the Home Department [2011] UKSC 12: detention legality, false imprisonment and Hardial Singh framework.
- Home Office — Adults at risk in immigration detention, updated 15 June 2026: no general statutory time limit but indefinite detention not lawfully possible under current framework.
- Home Office — Immigration bail guidance, updated 15 June 2026: Secretary of State and First-tier Tribunal bail powers and bail where removal is not realistically achievable within a reasonable time.
- Immigration Act 2016 — Schedule 10: statutory immigration-bail framework.
- Home Office — Immigration detention statistics, year ending March 2026: entries, exits, bail, returns and detention duration.
- Home Office — Returns statistics, year ending March 2026: country constraints and current position for Afghan, Iranian and Syrian returns.
- Home Office — Country returns guide, updated July 2026: country-specific acceptance and travel-document constraints.
- Home Office — Detention Case Progression Panels, updated April 2026: second-line review of continued detention and case progression.

5.9 — Source Register: Treaty Override by Emergency: Can Reform Simply Disapply Refugee, Torture and Trafficking Law?

- Reform UK — Operation Restoring Justice: proposed Mass Deportation Bill, treaty disapplication and claimed emergency/necessity framework.
- United Nations Treaty Series — Vienna Convention on the Law of Treaties: Articles 26–27, 42–43, 54, 62 and 65.

- International Law Commission — Articles on Responsibility of States for Internationally Wrongful Acts, Article 25 and commentary on necessity.
- International Court of Justice — Gabčíkovo-Nagymaros Project (Hungary/Slovakia), Judgment of 25 September 1997: necessity exceptional; cumulative conditions; state not sole judge.
- UNHCR — 1951 Convention relating to the Status of Refugees: Article 33 non-refoulement and Article 44 denunciation.
- OHCHR — Core International Human Rights Treaties: Convention Against Torture, Articles 2, 3 and 31.
- Committee Against Torture — General Comment No. 4 (2017): Article 3 non-refoulement includes forcible return, frontier rejection and pushback operations.
- United Nations Treaty Collection — Convention Against Torture status and treaty record.
- Council of Europe — Convention on Action against Trafficking in Human Beings (CETS No. 197): Articles 10, 40, 45 and 46.
- House of Commons Library — Principles of International Law: UK dualism, treaty obligations and international responsibility.
- House of Commons Library — How Parliament treats treaties: Government treaty powers and the distinction between treaty obligations and domestic implementation.
- House of Commons Library — The European Convention on Human Rights and the Human Rights Act 1998, June 2026.

5.10 — Source Register: The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

- Reform UK — Operation Restoring Justice: proposed ECHR withdrawal, treaty disapplication, restricted claims and mass-removal framework.
- House of Commons Library — The European Convention on Human Rights and the Human Rights Act 1998, 2 June 2026: ECHR withdrawal and continuing obligations under UN treaties/customary international law.
- UK Supreme Court — AAA and others v Secretary of State for the Home Department [2023] UKSC 42: Rwanda, safe-third-country assessment and real risk of refoulement.
- International Court of Justice — Belgium v Senegal, Judgment of 20 July 2012: prohibition of torture as customary international law and jus cogens.
- International Law Commission — Articles on Responsibility of States for Internationally Wrongful Acts: peremptory norms and circumstances precluding wrongfulness.
- OHCHR — Convention Against Torture: Article 3 non-refoulement and treaty obligations.
- Committee Against Torture — General Comment No. 4 (2017): implementation of Article 3 in the context of non-refoulement.
- HM Courts & Tribunals Service — Apply for judicial review in an immigration or asylum case, updated 13 July 2026.
- Home Office — Judicial reviews, injunctions and applications to the European Court of Human Rights, updated March 2026.
- Illegal Migration Act 2023 — explanatory notes on serious-harm suspensive claims and serious/irreversible harm.

- Home Office — About Country Policy and Information Notes, June 2026: purpose, methodology and use in asylum/human-rights decision-making.
- Home Office — Afghanistan country policy and information notes, updated May 2026.
- Home Office — Syria country policy and information notes, updated July 2026.
- Home Office — Iraq country policy and information notes, updated July 2026.
- Home Office — Immigration Rules Part 11: asylum and humanitarian protection, updated July 2026.

5.11 — Source Register: The Workforce Problem: Who Actually Delivers 600,000 Removals?

- Reform UK — Operation Restoring Justice: 600,000-removal target, Deportation Command and 24,000-place detention proposal.
- Home Office — Immigration Enforcement careers: around 5,000 staff and the organisation's enforcement, intelligence and returns missions.
- Home Office — Returns statistics, year ending March 2026: 9,723 enforced returns and the reallocation of 1,000 staff to immigration enforcement.
- Home Office — June 2026 detention expansion announcement: Immigration Enforcement budget doubling and workforce increase of 60% from the 2024 baseline.
- Home Office Careers — Immigration Enforcement officer account: five weeks immigration training plus two weeks Personal Safety Training.
- Home Office Careers — Security checks: vetting, pre-employment screening and additional integrity checks for Border Force and Immigration Enforcement.
- Home Office Careers — June 2026 Immigration Caseworker recruitment: removal/deportation case progression and decision-making functions.
- Home Office Careers — May 2026 PIP2 investigator recruitment: existing professional accreditation required for specialist investigator roles.
- Home Office — Detainee Custody Officer and DCO(E) certification, updated June 2026.
- Home Office — Annex C DCO training requirements, updated 26 June 2026.
- Home Office — Derwentside IRC factsheet: healthcare, staffing and ancillary-service requirements in detention.
- Home Office — Detention statistics, year ending March 2026: 22,586 detention entries and 1,955 people detained under immigration powers at 31 March 2026.
- Home Office / Find a Tender — 2025 preliminary market engagement for Escorting and Related Services: in-country and overseas escorting and short-term holding facilities.
- Home Office — Interpreter code of conduct and guidance, updated March 2026.
- Home Office — Detention Services Order 02/2022, updated June 2026: interpretation services and translation devices in detention.
- Ministry of Justice — Tribunal Statistics Quarterly, January to March 2026: FTTIAC receipts, disposals and open caseload.
- National Audit Office — An analysis of the asylum system, December 2025: system-wide capacity, workforce, data and quality bottlenecks.
- National Audit Office — Asylum and protection transformation programme: caseworker training/productivity as an implementation constraint.

- Home Office — Workforce diversity statistics 2024 to 2025: department headcount and concentration in Migration and Borders Operations.

5.12 — Source Register: The Detention Economy: Procurement, Contractors and Who Could Profit?

- Reform UK — Operation Restoring Justice: 24,000-place detention proposal and mass-removal framework.
- Home Office — Mitie to manage Dungavel and Derwentside IRCs; existing management of Harmondsworth and Colnbrook.
- Find a Tender — Derwentside/Hassockfield operational, management and maintenance contract: urgency route, Mitie award and £166m published value.
- Home Office — Serco awarded Brook House and Tinsley House IRC contract; existing Yarl's Wood operation and contract term.
- Find a Tender — Escorting and Related Services planned procurement, February 2026.
- Cabinet Office — Procurement Act 2023 guidance: Conflicts of Interest, updated July 2026.
- Cabinet Office — Procurement Act 2023 guidance: Direct Award, including extreme and unavoidable urgency, updated July 2026.
- Cabinet Office — National Security Unit for Procurement, updated June 2026.
- Cabinet Office — Procurement Act national-security exclusions guidance, updated June 2026.
- Legislation.gov.uk — Procurement Act 2023: exclusion and debarment framework.
- QinetiQ regulatory announcement — June 2026 major holding: Klear Kite LLC at 15.0%; Christopher Harborne identified as ultimate controlling person.
- QinetiQ regulatory announcement — August 2022: Harborne described as sole ultimate beneficial owner and controller of transferred QinetiQ shares.
- Ministry of Defence — £1.5bn five-year QinetiQ contract extension across 16 MOD sites, May 2025.
- QinetiQ — company capabilities: defence/security, test and training, mission support, R&D and engineering.
- QinetiQ — Long Term Partnering Agreement: MOD facilities and infrastructure modernisation.

5.13 — Source Register: The Critical Path: Can the Deportation Machine Be Built in Time?

- Reform UK — Current policy page: five-year Operation Restoring Justice, 24,000 detention capacity, Deportation Command and up to five flights per day.
- European Court of Human Rights — European Convention on Human Rights, Article 58: six-month denunciation notice.
- UNHCR — Convention Relating to the Status of Refugees, Article 44: denunciation effective one year after receipt.
- OHCHR — Convention Against Torture, Article 31: denunciation effective one year after receipt.
- Council of Europe — Convention on Action against Trafficking in Human Beings, Article 46: denunciation after the three-month period.

- Home Office — IRCEP Senior Responsible Owner appointment letter: 1,000 extra beds, phased delivery plan through 2030 and Campsfield/Haslar phases.
- Home Office — IRCEP Accounting Officer Assessment: Amber delivery confidence; construction complexity, material supply and resourcing risks; Treasury/Cabinet Office and MoJ involvement.
- Home Office — Campsfield IRC factsheet: Phase 1 opened December 2025 with 160 beds.
- Planning Inspectorate — Haslar IRC Crown development application, consultation status August 2026.
- Cabinet Office — Procurement Act 2023 guidance on direct award: extreme and unavoidable urgency cannot be created merely by insufficient procurement planning.
- Home Office — 29 June 2026 enforcement expansion: Immigration Enforcement workforce to rise 60% from 2024 baseline during 2026–27.
- Home Office — Returns statistics, year ending March 2026: 39,007 total returns and 9,723 enforced returns.
- Home Office / Border Security Command — UK–France agreement data to 30 June 2026: 1,087 returns to France and monthly operational ramp.
- UK–France Agreement on the Prevention of Dangerous Journeys — treaty text and operational architecture.
- Cabinet Office — Procurement Act 2023 conflicts-of-interest guidance, updated July 2026.

5.14 — Source Register: Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

- Reform UK — Policies: Operation Restoring Justice, five-year programme, 24,000 detention capacity, Deportation Command, treaty policy, five flights per day and claimed savings.
- Home Office — Returns statistics, year ending March 2026: 39,007 total returns and 9,723 enforced returns.
- Home Office — Detention statistics, year ending March 2026: 22,586 detention entries and approximately 2,000 detained at period end.
- Home Office — June 2026 Immigration Enforcement expansion: budget doubling and workforce increase of 60% from the 2024 baseline during 2026–27.
- Home Office / Border Security Command — UK–France agreement statistics to 30 June 2026: 1,087 completed returns to France.
- Home Office — Immigration Removal Centre Expansion Programme Accounting Officer Assessment: 1,000-bed programme, delivery risks, procurement and value-for-money governance.
- NISTA — Major Projects Annual Report 2025–26 data: IRCEP Amber delivery confidence and phased Campsfield/Haslar progress.
- Cabinet Office — Procurement Act 2023 direct-award guidance: extreme urgency must be unavoidable, unforeseeable and not attributable to the contracting authority.
- National Audit Office — Four critical requirements for a fair, efficient asylum system: data-quality and system-wide workforce/capacity constraints.
- European Court of Human Rights — European Convention on Human Rights, Article 58: denunciation procedure.

- UNHCR — Convention Relating to the Status of Refugees, Article 44: denunciation procedure.
- OHCHR — Convention Against Torture, Article 31: denunciation procedure.
- Council of Europe — Convention on Action against Trafficking in Human Beings, Article 46: denunciation procedure.

Part V — Supplementary section-end evidential summaries

The following section-end "What the Evidence Supports / Does Not Support" summaries supplement the main report. The underlying evidence remains in each substantive section, while §5.14 provides the cumulative Part V scorecard and verdict.

5.1 From Promise to Statute: A Policy Feasibility Audit

17. What the Evidence Supports

- Reform has moved beyond a slogan-level immigration position and now specifies legislation, an enforcement command, detention capacity, flight frequency and a claimed fiscal effect.
- A UK government with a parliamentary majority possesses substantial domestic legislative power to change immigration and human-rights law.
- ECHR withdrawal is legally possible but cannot take effect immediately; Article 58 requires six months' notice.
- Refugee Convention withdrawal has a separate one-year timetable.
- Other non-refoulement obligations, including the Convention against Torture, mean ECHR withdrawal alone does not create unlimited removal authority.
- Return at scale depends upon documentation and cooperation from destination states; that dependency cannot be removed by UK primary legislation.
- Reform's 600,000 five-year ambition implies approximately 120,000 removals per year, a scale far above current asylum-related returns.
- Operation Fortress cannot unilaterally guarantee return to France because readmission into French territory requires a legal/cooperative basis.
- Reform's £42bn net-saving claim cannot yet be independently reproduced from the publicly available headline assumptions.

18. What the Evidence Does Not Support

The Part V Standard

"The question is not whether government possesses power. It is whether the proposed chain from law → institution → capacity → cooperation → expenditure → outcome is complete."

That chain will now be applied consistently to the rest of Reform's programme.

5.2 The £42 Billion Question: Costing Mass Deportation

18. What the Evidence Supports

- Reform officially claims £42bn of net savings over ten years and £7bn during its first Parliament from Operation Restoring Justice.
- Contemporary launch reporting puts Reform's gross five-year implementation budget at approximately £10bn.
- The publicly reported component allocations identify about £9bn, leaving roughly £1bn not explained in that breakdown.
- The Home Office estimates the current average enforced return at £48,800 and voluntary return at £4,300.
- At unchanged current unit costs, 600,000 enforced returns would cost approximately £29.3bn; this is a benchmark, not a forecast.
- Reform's reported £1.5bn flight allocation implies £2,500 per removal if spread across 600,000 people.
- The NAO recorded a much higher £11,000-per-person flight planning assumption for Rwanda, although that route is not representative of every destination.
- The March 2026 asylum-support population was below 100,000, far smaller than Reform's proposed removal population.
- Hotel accommodation is much more expensive than dispersal accommodation, so successfully ending hotel dependence can produce substantial genuine savings.
- Hotel use and asylum-support numbers were already falling before any Reform government, so the savings counterfactual must reflect that trajectory.
- The £42bn net figure cannot currently be independently reproduced from the public assumptions reviewed.

19. What the Evidence Does Not Support

The Central Fiscal Question

"If Reform can identify 600,000 removable people, what proportion leaves voluntarily, what does each remaining enforced case cost, and which specific public expenditure disappears after that person leaves?"

Until those three questions are answered cohort by cohort, a ten-year net saving is a political forecast rather than a reproducible fiscal result.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

18. What the Evidence Supports

- 600,000 removals over five years require an average of 120,000 a year and about 329 a day.
- Current total returns are 39,007 a year; current enforced returns are 9,723.
- Current returns are predominantly voluntary, which demonstrates that voluntary departure can materially reduce enforcement demand.

- 24,000 detention places are not mathematically inconsistent with 120,000 annual removals if detention turnover is sufficiently fast.
- The proposed detention estate would nevertheless represent a transformation of current operating scale, not an incremental expansion.
- Home Office guidance requires casework barriers, fitness, authorisation and documentation to be resolved before removal.
- Foreign-country documentation times vary from days to a year or more, and some destinations currently do not accept enforced returns.
- Charter manifests require individual case preparation and can lose cases through documentation, legal, medical or operational failure.
- Escort availability is already constrained around charter operations in the current system.
- Aircraft capacity alone does not determine removal capacity.
- Destination acceptance and travel documentation are strong candidates for the programme's ultimate binding constraint because they cannot be controlled unilaterally by the UK.

19. What the Evidence Does Not Support

The Central Operational Question

"Can Reform produce 329 completed, destination-accepted departures every day — not for a week, but on average for five years — after documentation failures, legal barriers, medical cases, escort limits, cancellations and foreign-government decisions are included?"

That is the operational burden of proof created by the 600,000 target.

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

18. What the Evidence Supports

- Britain can substantially change its domestic immigration and detention law through Parliament.
- A completed international removal nevertheless requires a destination that will lawfully and practically receive the person.
- Post-Brexit safe-third-country returns are explicitly subject to the receiving country's agreement.
- The UK–France pilot demonstrates that direct returns to France are possible when France agrees a defined reciprocal mechanism.
- As of 30 June 2026, 1,087 people had been returned to France and 1,117 transferred from France to the UK under that agreement.
- The UK lost access to the Dublin III transfer framework after the Brexit transition period.
- Operation Fortress cannot create French readmission rights merely by deploying the Royal Navy.

- British military vessels cannot treat French territorial waters as British operational territory without French consent.
- Albania demonstrates that bilateral cooperation can materially increase returns.
- Afghanistan demonstrates that domestic removal policy can encounter a zero-throughput external documentation/acceptance constraint.
- The £2bn diplomatic component of Reform's programme cannot be assessed without country-specific assumptions.
- Foreign-state cooperation is therefore not a peripheral implementation detail; it is part of the core capacity of the removal system.

19. What the Evidence Does Not Support

The Central Sovereignty Question

"If Britain insists that no foreign government may decide who enters British territory, on what basis can Britain assume that it may decide who enters French, Albanian, Afghan or any other sovereign territory?"

That is not a philosophical objection to removals. It is the practical negotiating problem at the centre of them.

5.5 Operation Fortress at Sea: Interception, Rescue and the Law of the Channel

17. What the Evidence Supports

- The Royal Navy has substantial surveillance, command, seamanship and rescue capabilities relevant to the Channel.
- UNCLOS and the international search-and-rescue framework impose duties to assist people in distress at sea.
- Rescue and immigration return are separate operational stages.
- The UK previously placed Channel coordination under Defence through Operation Isotrope.
- The Royal Navy did not implement or assist turnaround tactics under Defence primacy after the earlier policy was withdrawn.
- The Defence Committee identified serious concerns about objectives, resources, reputation and the effect on relations with France.
- Retired senior naval officers have repeatedly questioned the deterrent value and platform suitability of naval deployment.
- Additional naval assets can increase rescue capacity without necessarily reducing departures.
- Warships are not required merely because a task occurs at sea; smaller or civilian platforms may be better suited to routine interception and transport.
- A routine "turnaround" doctrine requires an answer to refusal, distress, towing, transfer and disembarkation.
- Without a French or other agreed destination, naval interception does not itself create a completed return.

18. What the Evidence Does Not Support

The Central Naval Question

"When an overloaded dinghy refuses to turn around, becomes unsafe or enters distress, what precisely is the Royal Navy ordered to do next — and where, with whose consent, does that operation end?"

Until Operation Fortress answers that sequence, "turn the boats around" describes an intended result rather than an executable naval doctrine.

5.6 The Detention State: Building and Operating 24,000 Secure Places

19. What the Evidence Supports

- Reform has committed to at least 24,000 immigration detention places and has described rapid delivery as central to its mass-removal programme.
- 24,000 places would be almost ten times the immigration-detention capacity reported by the Home Office in June 2025.
- The current Government regards roughly 1,000 additional Campsfield/Haslar places as a major national expansion contributing to a 40% capacity increase.
- Early official capital estimates for Campsfield and Haslar totalled £240m–£260m for 1,000 planned places, excluding inflation, optimism bias and contingency.
- Reform's reported £2bn capital allocation implies approximately £83,333 per place.
- A mechanical application of the Campsfield/Haslar benchmark produces £5.76bn–£6.24bn for 24,000 places.
- That extrapolation is a comparator, not a forecast; economies of scale and different site/specification choices could materially change cost.
- IRC operating contracts encompass much more than guarding and accommodation.
- Historical operator-contract values for Campsfield and Haslar indicate recurring costs on a scale that could exceed £1bn a year if mechanically scaled to 24,000 places.
- Healthcare is separately commissioned in at least some of the estate and must be included in a complete fiscal model.
- The proposed 18-month timetable would require unprecedented parallel delivery and commissioning.
- Site selection affects whole-system removal cost through transport, workforce, healthcare and airport access.

20. What the Evidence Does Not Support

The Central Estate Question

"What exactly can Reform build for £83,333 per secure detention place, where will it build it, who will operate it, and how will 24,000 places be designed, procured, staffed, medically supported and commissioned within the promised timetable?"

Until those inputs are published, the 24,000 figure is a capacity target rather than a costed estate plan.

5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State

22. What the Evidence Supports

- Reform explicitly proposes a UK Deportation Command and Illegal Migrant Identification Centre based on automatic data sharing across major public and private-sector systems.
- The policy explicitly proposes mandatory biometric capture during police encounters and bulk-warrant powers.
- Immigration Enforcement already possesses substantial visit, arrest, search and warrant powers.
- More than 17,400 illegal-working enforcement visits and more than 12,300 arrests occurred between July 2024 and December 2025.
- The Home Office already retains and uses immigration fingerprints and facial images for identity assurance and enforcement-related functions.
- Immigration Enforcement began live-facial-recognition deployments in 2025.
- Home Office services acknowledge that immigration-status and eVisa records can sometimes be incorrect and require correction.
- The Windrush Lessons Learned process established that incomplete records and flawed casework can cause lawful residents to be caught by immigration-enforcement systems.
- Biometric identity assurance does not eliminate the need for accurate legal-status decision-making.
- At mass scale, false positives create both rights risks and operational capacity costs.
- The policy's success should be measured by completed removals rather than raids or arrests.

23. What the Evidence Does Not Support

The Central Identification Question

"How does Reform prevent an automated suspicion generated by several linked databases from becoming a raid, arrest and detention before a competent human has established that the person identified is both the right person and legally removable?"

That safeguard is not peripheral to mass enforcement. It is one of the conditions required for the system to operate accurately at all.

5.8 Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person

21. What the Evidence Supports

- Reform explicitly proposes detention powers without Hardial Singh constraints and says people would be detained until deported.
- The UK already has no general statutory maximum period of immigration detention.
- Current law nevertheless requires detention to remain connected to an achievable statutory purpose within a reasonable timeframe.
- Section 12 of the Illegal Migration Act 2023 has already shifted significant discretion over the reasonable period toward the Secretary of State.
- Current Home Office guidance still states that detention cannot continue where there has ceased to be a realistic prospect of removal within a reasonable period.
- The Supreme Court has treated loss of realistic removal prospects as capable of ending the ordinary legal basis for detention.
- Some countries currently do not accept enforced returns or present serious documentation barriers.
- For those cohorts, detention until deportation can have no reliably foreseeable end date.
- Immigration bail provides conditional alternatives to custody and currently remains available through the Secretary of State and First-tier Tribunal subject to statutory rules.
- In the year ending March 2026, immigration bail was the most common reason for leaving detention, while 44% of detention leavers were returned.
- Long-stay unremovable detainees reduce the bed turnover on which Reform's 24,000-place capacity model depends.

22. What the Evidence Does Not Support

The Central Liberty Question

"If the state cannot say when a person can be deported — because no destination will accept them or no travel document can be obtained — what lawful event, other than deportation itself, requires Reform's Home Secretary to release them?"

If the answer is "none", the proposal is not simply faster removal. It is a new model of open-ended executive custody.

5.9 Treaty Override by Emergency: Can Reform Simply Disapply Refugee, Torture and Trafficking Law?

23. What the Evidence Supports

- Reform explicitly proposes temporary disapplication of major international protection obligations during its mass-removal programme.

- The UK is a dualist state, so domestic legislation and international treaty obligations can have different legal effects.
- Article 27 of the Vienna Convention prevents a state from relying on internal law as international justification for treaty non-performance.
- The Vienna Convention contains rules governing termination, withdrawal and suspension; it does not contain a general migration-emergency override.
- The modern necessity doctrine is reflected in Article 25 of the ILC Articles on State Responsibility and is recognised in customary international law.
- Necessity is exceptional and subject to cumulative requirements including grave and imminent peril and "only way".
- The ICJ has said the invoking state is not the sole judge of whether those requirements are met.
- Necessity precludes wrongfulness only in the circumstances in which it validly applies; it does not itself terminate the underlying treaty.
- The Refugee Convention and CAT each provide one-year denunciation procedures.
- ECAT provides a denunciation procedure taking effect after roughly three months.
- Formal treaty withdrawal and domestic statutory disapplication are legally distinct.
- Some international obligations may continue independently as customary or peremptory international law even after treaty withdrawal.

24. What the Evidence Does Not Support

The Central Treaty Question

"Is Reform proposing to withdraw lawfully from these treaties, or to remain a party while instructing the British state not to perform them — and if the latter, what is the legal basis for claiming that a self-declared five-year migration emergency satisfies every condition of international necessity?"

Until that distinction is answered, "disapply the treaties" collapses domestic parliamentary power, treaty withdrawal and state responsibility into a single political phrase.

5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

23. What the Evidence Supports

- ECHR withdrawal would substantially reduce one layer of legal constraint but would not automatically extinguish other treaties, domestic public law or customary international law.
- The Commons Library expressly recognises that some rights may continue to bind the UK through UN treaties or customary international law after ECHR withdrawal.
- The ICJ has held that the prohibition of torture is customary international law and jus cogens.
- The precise customary and peremptory status of all forms of non-refoulement is more contested and should be analysed carefully rather than overstated.

- The Supreme Court's Rwanda litigation demonstrates that a country's agreement to receive people is distinct from whether transfer creates a real risk of refoulement.
- Judicial review is a domestic mechanism that exists independently of the Human Rights Act.
- Current immigration judicial review can challenge unlawful, illegal, irrational or unreasonable public action.
- Country-risk evidence is an operational necessity because factual conditions determine whether removal arrangements work and what residual legal rules are engaged.
- Restricting appeals and suspensive claims increases the importance of accurate first-instance decision-making.
- A mass-removal system therefore retains a protection-analysis function even if Reform abolishes much of the current protection architecture.

24. What the Evidence Does Not Support

The Central Protection-Floor Question

"After Reform removes the legal protections it says it will remove, what rule governs the case in which another country is willing to take a person but credible evidence shows that sending that particular person there may expose them to torture or onward refoulement?"

A serious mass-removal plan needs an answer more precise than "the treaties no longer apply", because treaty withdrawal, domestic authority, peremptory norms, customary law and destination facts are separate parts of the problem.

5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?

25. What the Evidence Supports

- Reform's annual target of 120,000 removals is about 12.3 times the 9,723 enforced returns recorded in the year ending March 2026.
- Around 5,000 people currently work across Immigration Enforcement, covering multiple missions rather than removals alone.
- The current government has already reallocated 1,000 staff to immigration enforcement and announced a 60% workforce increase from the 2024 baseline during 2026–27.
- Immigration Enforcement officers undergo role training and Personal Safety Training, and applicants are subject to vetting, pre-employment screening and integrity checks.
- Detainee Custody Officers and escort officers require mandatory training and certification before undertaking their roles.
- Immigration detention requires healthcare and other ancillary staffing as well as custody staff.
- Escorting is a separate contracted operational system covering in-country movement and overseas removal.
- The Home Office uses dedicated interpreter-management arrangements and detention interpretation procedures.

- The Immigration and Asylum Chamber entered 2026/27 with a large and rising open caseload after receipts substantially exceeded disposals in 2025/26.
- The NAO has identified workforce and capacity bottlenecks across the asylum system and warned that increasing speed in one stage can move problems elsewhere.
- Reform has not, in the public policy material examined for this report, published a reproducible year-by-year workforce establishment capable of being tested against its 600,000-removal target.

26. What the Evidence Does Not Support

The Central Workforce Question

"How many trained, vetted and independently productive people does Reform need in each function, in each year, to convert 120,000 annual removal decisions into 120,000 completed removals — and where will those people come from?"

Until Reform publishes that establishment and ramp, "600,000 removals" remains a throughput target without a human-resources specification.

5.12 The Detention Economy: Procurement, Contractors and Who Could Profit?

25. What the Evidence Supports

- Reform's 24,000-place proposal would create a large commercial market across construction, custody, facilities management, healthcare, catering, escorting, technology and security.
- Mitie and Serco have directly evidenced experience operating UK Immigration Removal Centres.
- The Home Office separately procures in-country and overseas escorting as a fundamental part of the detention/removal system.
- Existing operators are structurally advantaged in rapid mobilisation because they possess experience, systems and trained staff.
- The Procurement Act 2023 requires integrity and contains conflict-of-interest, exclusion and transparency mechanisms relevant to future awards.
- Extreme urgency is a constrained procurement justification and cannot ordinarily be manufactured by an authority's own failure to plan.
- Derwentside provides a real example of an immigration-detention contract awarded through an urgency-based negotiated route, with a published value of £166 million.
- Christopher Harborne is the ultimate controlling person behind Klear Kite LLC, which disclosed a 15.0% QinetiQ voting-rights holding in June 2026.
- QinetiQ is a major defence/security government contractor and holds substantial MOD work, including a £1.5 billion five-year extension announced in 2025.
- The Harborne-QinetiQ relationship therefore creates a legitimate prospective transparency issue if a Reform government procures security-related infrastructure or services.

26. What the Evidence Does Not Support

The Central Procurement Question

"If Reform creates a multi-billion-pound detention and security market while relying heavily on a small number of wealthy donors, what independently verifiable safeguards will ensure that contracts are awarded because suppliers offer the best lawful solution — not because of political access, donor relationships or an emergency timetable created by the Government itself?"

That question does not allege corruption. It defines the transparency standard required to distinguish ordinary public contracting from donor-influence risk.

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

24. What the Evidence Supports

- Reform's programme contains multiple interdependent workstreams that can begin in parallel but must ultimately converge before a completed removal occurs.
- ECHR withdrawal requires six months' notice; Refugee Convention and CAT withdrawal each require one year; ECAT withdrawal takes roughly three months.
- Current Home Office detention expansion demonstrates that secure-estate delivery requires major-project governance, procurement, construction, mobilisation and operator contracts.
- The current 1,000-bed Campsfield/Haslar programme has a phased delivery plan through 2030 and has carried an Amber delivery-confidence assessment.
- Home Office risk reporting identifies construction complexity, material supply and labour-market recruitment/retention as real programme risks.
- Current government Immigration Enforcement staffing is already being increased by 60% from the 2024 baseline during 2026–27.
- The UK–France agreement returned 1,087 people to France by 30 June 2026 and shows a real operational ramp rather than instant mature throughput.
- Reform can use inherited enforcement, detention and returns capacity while building its new system; it does not start from zero.
- If early-year removals fall below 120,000, later-year annual throughput must rise above 120,000 to preserve the five-year 600,000 total.
- Reform has not published a sufficiently detailed critical-path schedule showing when each essential capability becomes operational and how annual removal throughput ramps as a result.

25. What the Evidence Does Not Support

The Central Critical-Path Question

"On what date after taking office does Reform expect the combined system — law, detention estate, trained workforce, identification pipeline, return agreements, documentation, escorts and flights — to become capable of sustaining 10,000 completed removals every month, and what annual rate must it reach if that date slips?"

Without a dated answer, the five-year total cannot be tested as an implementation programme; it remains an end-state target.

Part V — Supplementary baseline explanations

Generic explanations of recurring delivery constraints were removed from later Part V sections where the same principle is already established in the Part V Common Delivery Baseline. These paragraphs are preserved here; unique calculations, facts and section-specific applications remain in the main report.

5.1 From Promise to Statute: A Policy Feasibility Audit

The cost model also needs sensitivity analysis. If return agreements take longer, detention duration rises. If detainees cannot be removed, bed turnover falls. If third countries require payments, gross cost rises. If the removable population is smaller than assumed, projected avoided support expenditure falls.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

Returns to countries with reliable documentation processes and regular scheduled routes can move quickly. Returns to countries requiring interviews, lengthy ETD verification or political agreements move slowly. Some destinations currently do not accept enforced returns at all.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

A person can be legally liable to removal yet not presently be practically removable. Identity may be uncertain. A passport may be absent. The relevant country may require an interview. An emergency document may take months. A route may not exist. A transit state or airline may refuse carriage. The destination may not accept enforced return.

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

If France agrees to accept those intercepted, the policy becomes a bilateral returns operation. If France does not agree, the British vessel has custody of people whom Britain still needs to disembark somewhere.

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

Maritime law requires assistance to persons in distress and coordination toward safe disembarkation. It does not create a general British power to choose another sovereign state's coastline as the destination regardless of that state's consent.

5.4 The Sovereignty Paradox: Return Agreements, France and the States Britain Cannot Command

There is no standard price for another sovereign state's cooperation. Some states readily readmit verified nationals under established processes. Others require extensive documentary evidence. Third-country arrangements can require fixed payments, per-person payments, development funding or wider diplomatic concessions.

5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

But their value depends on specificity, credibility, monitoring, the receiving state's record, the ability to detect breach and the consequences if breach occurs.

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

Return agreements require another state to decide that cooperation serves its interests and then to implement documentary, operational and sometimes financial arrangements.

5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

The UK can decide whom it wishes to remove. It cannot unilaterally decide that another sovereign state must admit that person.

5.6 The Detention State: Building and Operating 24,000 Secure Places

That figure should not automatically be compared with a hotel room or modular bedroom. A detention place sits inside a secure institution with perimeter security, controlled movement, reception and discharge functions, healthcare, kitchens, visits and legal-access facilities, staff areas, communications, fire safety, utilities, exercise/recreation, segregation or specialist accommodation where required, secure transport access and substantial operating infrastructure.

5.8 Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person

The operational effect is straightforward. Arrest powers and detention capacity can be expanded domestically while enforced-return throughput for a nationality remains at or near zero because the destination does not cooperate.

5.12 The Detention Economy: Procurement, Contractors and Who Could Profit?

The existing immigration detention estate demonstrates that the Home Office does not ordinarily operate every centre directly. Major private contractors already manage centres under long-term public contracts.

5.2 The £42 Billion Question: Costing Mass Deportation

This is especially important where expenditure would continue under Reform. Britain would still require Border Force, immigration caseworkers, detention facilities, asylum processing for lawful claimants, courts, enforcement teams and international cooperation after the five-year emergency programme.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

But current Home Office guidance shows why removals cannot be manufactured simply by filling detention centres. Before removal can be arranged there must be no outstanding casework barrier; the person must be fit to remove; appropriate authorisation must exist; and a valid travel document or agreement must normally be secured.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

The difficulty is the phrase “removal-ready”. Detaining someone does not create a passport, make an embassy verify nationality, dispose of outstanding casework or make a destination accept them.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

Home Office removal guidance requires a valid travel document or valid travel-document agreement before removal is normally arranged. That creates a dependency on nationality evidence and, frequently, a foreign diplomatic mission.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

For charter/group removals, caseworkers must maintain evidence that notices were served, generate an immigration factual summary, provide documents to legal representatives, send travel documents and photographs to the Charters team where required, obtain fitness confirmation for relevant medical cases, coordinate emergency travel-document collection and complete a 24-hour pre-removal check.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

More importantly, an empty seat cannot remove a second person whose emergency travel document is still waiting at an embassy.

5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State

They do not ordinarily provide the Home Office with a verified name, current address, nationality, travel document and fully resolved legal case for every estimated person.

5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State

An arrest can end in detention, release, bail, casework, successful challenge, documentation delay, voluntary return or enforced removal. The ratio between arrest and completed removal therefore matters more than arrest totals alone.

5.7 Finding 600,000 People: Deportation Command, Raids and the Surveillance State

If every automated flag requires competent human case validation before a raid, Reform needs a very large casework workforce. If flags do not receive meaningful human review, the error risk rises.

5.8 Detention Without an Exit: Hardial Singh, Indefinite Custody and the Unremovable Person

Where removal is not immediately possible, government can use reporting, residence requirements, electronic monitoring and re-detention if circumstances change — for example, when a travel document becomes available.

5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

Officials must know whether an airport is operating, whether a travel document will be recognised, whether local authorities will receive the person, whether onward transfer is likely, whether a receiving arrangement is functioning and whether particular categories face risks that engage whatever legal floor remains.

5.10 The Protection Floor: What Still Stops a Removal After Reform Rewrites the Law?

That means Reform cannot abolish protection casework entirely without replacing it with another form of destination-risk assessment.

5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?

The exact path varies, but a difficult case can require intelligence and tracing; enforcement planning; arrest; identity and nationality work; casework; service of decisions; detention engagement; healthcare assessment; interpreter bookings; travel-document liaison; embassy contact; legal review; bail or court work; transport; flight booking; escort risk assessment; custody escorting; airport handover; and sometimes overseas escorting.

5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?

The role requires judgement because a case can involve identity, criminal history, family circumstances, protection issues, travel documentation and litigation.

5.11 The Workforce Problem: Who Actually Delivers 600,000 Removals?

The table below is deliberately an illustration, not a prediction. It asks how many full-time-equivalent caseworkers would be required if each independently productive caseworker completed a specified number of successful removal cases per year.

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

Parallel working reduces elapsed time, but it does not remove dependencies. A detention centre cannot operate before it has staff and an operator. An arrested person cannot be removed merely because a bed exists if there is no travel document or destination agreement. A flight cannot create passengers whose cases are not removal-ready.

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

Operation Restoring Justice contains at least six workstreams that must converge: legal authority, detention infrastructure, workforce, identification/casework, foreign-state cooperation and removal logistics.

5.13 The Critical Path: Can the Deportation Machine Be Built in Time?

Conversely, if charter capacity ramps only after casework and detention are ready, later years require higher utilisation.

5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

The legal programme can reduce friction. It cannot manufacture a destination country, a travel document, a detention officer or an aircraft manifest.

5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

The difficulty is that the programme requires several different labour markets simultaneously: enforcement officers, caseworkers, intelligence analysts, data specialists, custody officers, escorts, clinicians, interpreters, lawyers, contract managers and trainers.

5.14 Operation Restoring Justice: Feasibility Scorecard and Evidential Verdict

Reform is correct about one underlying systems point: removal policy cannot be treated as a narrow Home Office caseworking problem.

5.2 The £42 Billion Question: Costing Mass Deportation

That is an occupancy requirement, not simply an aircraft-capacity requirement. A large aircraft can carry far more than 66 passengers. The operational difficulty is assembling 66 legally and practically removable people for each departure to destinations willing to receive them, with correct identity documents, escorts and medical/security arrangements.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

At five charter flights per day, the programme requires an average of about 66 completed removals per flight if the entire target travels on those flights. In practice some removals would use scheduled services and some voluntary returnees would travel independently, so the five-flight headline is best understood as maximum charter capacity rather than the only transport channel.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

When a removal fails, tickets must be cancelled, case systems updated, escorts released and the case may have to be reset. On transit routes, failure to obtain airline acceptance across every leg can require an alternative route.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

Not every removal requires an in-flight escort, but many enforced cases do. Home Office guidance identifies medical concerns, violence/disruption and previous failed boarding as circumstances where escorts may be required.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

That sentence describes the present system. Reform's proposal would turn charter-flight days into every day. Five daily charters would therefore require a fundamentally different escort workforce and rostering model rather than simply purchasing more aircraft seats.

5.3 The Throughput Problem: Can the State Physically Remove 600,000 People?

Escort demand also extends beyond the aircraft: detainees must be moved between detention centres, hospitals and departure points, with secure transport and hospital bed watches required in some cases.

5.6 The Detention State: Building and Operating 24,000 Secure Places

The operator procurement separately includes hospital bed watches and local escorting, illustrating how healthcare generates custody requirements outside the perimeter as well as clinical requirements inside it.

Part VI — Donors, Networks and Influence

Section-level source registers and supplementary evidential material supporting Part VI.

6.1 — Source Register: From Donation to Influence: The Evidence Test

- Electoral Commission — Christopher Harborne search: eight Brexit Party/Reform UK donations in Q4 2019 totalling £6.525m.
- Electoral Commission — 2025 donation records: £9m Harborne donation to Reform received 31 July 2025 and £3m received 12 November 2025.
- Electoral Commission — Q4 2025 party donations: Reform accepted £5.456m in donations excluding public funds during the quarter.
- QinetiQ RNS — 30 May 2022: AML Global Ltd, solely controlled by Harborne, acquired approximately 7.08% of QinetiQ.
- QinetiQ RNS — 1 August 2022: 57,905,817 shares transferred AML Global → Klear Kite; Harborne remained sole ultimate beneficial owner/controller; approximately 10.01%.
- QinetiQ RNS — 22 January 2025: Klear Kite / Harborne holding approximately 12.63%.
- QinetiQ RNS — 20 October 2025: holding approximately 13.02%.
- QinetiQ RNS — 25 November 2025: holding approximately 14.02%.
- QinetiQ RNS — 17 June 2026: Klear Kite held 77,805,044 voting rights, approximately 15%; Harborne identified as ultimate controlling person.
- QinetiQ — FY2026 results: £3.573bn record order intake and £4.8bn backlog.
- Financial Times — 2019 reported message concerning campaign underwriting and proposed diversification of donor appearance; no associate donation was ultimately made.
- Guardian — 3 August 2026: Farage admission concerning discussions about returning to Reform leadership and questions around the £5m Harborne gift.
- Reform UK — Current policies, including border command and Operation Restoring Justice.

6.2 — Source Register: Christopher Harborne: The Chronology Test

- Electoral Commission — Christopher Harborne donation search and historic Brexit Party/Reform records.
- Financial Times — Harborne 2019 campaign-underwriting message and contemplated associate donation; article reports the indirect donation did not occur.
- Financial Times — profile of Harborne and his funding relationship with Farage/Reform.

- Guardian — 15 July 2026: reporting on Farage's March 2024 "million a year" discussion and Harborne lawyers' 5 April gift date.
- Guardian — 3 August 2026: Farage acknowledges spring 2024 discussions about returning to Reform leadership.
- Guardian — 29 April 2026: original reporting on the undisclosed £5m personal gift and longstanding Harborne–Farage relationship.
- UK Parliament — current Parliamentary Commissioner for Standards investigations: Farage inquiry opened 13 May 2026 and suspended 8 July 2026.
- QinetiQ RNS — 30 May 2022: AML Global / Harborne major holding approximately 7.08%.
- QinetiQ RNS — 1 August 2022: approximately 10.01%, transfer to Klear Kite, Harborne sole ultimate beneficial owner/controller.
- QinetiQ RNS — January 2025: Klear Kite / Harborne approximately 12.63%.
- QinetiQ RNS — October 2025: holding approximately 13.02%.
- QinetiQ RNS — November 2025: holding approximately 14.02%.
- QinetiQ RNS — June 2026: 77,805,044 voting rights / approximately 15%; Harborne ultimate controlling person.
- Ministry of Defence — May 2025: £1.5bn five-year QinetiQ contract extension across 16 MOD sites.
- Guardian — March 2026 profile: Harborne crypto interests, QinetiQ holding, political relationships and Reform donations.
- Reform UK — current policy platform for border/security and Operation Restoring Justice.

6.3 — Source Register: Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?

- Delaware Superior Court — Harborne v Dow Jones: court opinion records Harborne as a 12% minority stakeholder in Bitfinex and Tether.
- Guardian — 6 March 2026: Harborne's 12% Tether interest, Bitfinex stake, view that cryptocurrency should be regulated in the UK, and Reform crypto-policy alignment.
- Guardian — 30 May 2025: Reform announces crypto donations and proposed Cryptoassets and Digital Finance Bill, including 10% crypto CGT and bitcoin reserve.
- Guardian — 18 June 2026: Farage's Bank of England intervention, opposition to digital pound, stablecoin holding-limit advocacy, Tether/DCGG policy overlap and Harborne lobbying history.
- Guardian — 8 July 2026: Andrew Bailey confirms Farage made crypto views clear and states no Bank policy changes resulted from Farage's interventions.
- Guardian — 15 July 2026: Bailey says he would have postponed Farage meeting had £5m gift investigation been known at the time.
- UK Parliament — March 2026 Electoral Commission answer: cryptoassets treated as non-monetary political donations and subject to reporting rules.
- UK Government — 25 March 2026: planned moratorium on crypto political donations and cap on overseas-elector donations.
- UK Parliament — April 2026 answer: planned crypto-donation moratorium to apply to cryptoasset donations of any value.

- Protos — 1 July 2026: reporting that Reform removed its 2025 crypto bill from its website in May 2026.

6.4 — Source Register: Christopher Harborne, Tax and the Britannia Card: Who Would Benefit?

- Reform UK / Britannia Card — official policy site: £250,000 one-off contribution, 10-year renewable residence permit and preferential treatment of foreign income, gains and inheritance tax.
- Reuters — 23 June 2025: launch of the Britannia Card and Reform's stated objective of attracting wealthy internationally mobile people.
- HMRC — current 4-year foreign income and gains regime, replacing the remittance basis from 6 April 2025.
- HMRC — Residence and FIG manual: from 6 April 2025 UK residents generally taxed on worldwide income and gains, subject to qualifying FIG relief.
- HMRC — inheritance tax rules for long-term UK residents from 6 April 2025.
- GOV.UK — non-resident UK tax guidance on capital gains and inheritance-related asset rules.
- Guardian — 25 April 2026 profile: Harborne's Thai citizenship/base, reported former non-dom status, careful UK-day management, and possible implications of overseas-donor reforms.
- Guardian — 6 March 2026: Harborne's Thailand base, British/Thai identity, Tether/Bitfinex and QinetiQ interests, and Reform donations.
- Guardian — 30 May 2025: Reform crypto bill proposing a 10% CGT rate on cryptoassets.
- UK Government — 25 March 2026 announcement of tighter overseas-donor and crypto-donation rules.

6.5 — Source Register: The Donor–Policy Matrix: Is There a Wider Pattern?

- Electoral Commission — Q1 2026 Reform donations, including Harborne, Haidar, Udwadia and other reported donors.
- Reuters — 4 June 2026: Reform fundraising lead driven by £3m from Christopher Harborne and £4m from Ben Delo.
- Guardian — 4 June 2026: Q1 donor profile, including David Grainger and Navroz Udwadia.
- Guardian — 8 April 2026: Ben Delo's £4m Reform donations and stated political motivation.
- Medicxi — David Grainger biography: biotechnology, drug-development and life-sciences investment career.
- Alpha Wave Global — Navroz Udwadia biography: investment and finance background.
- BH Holdings — Bassim Haidar biography: fintech, telecoms, technology, logistics, energy and investment interests.
- Guardian — 19 September 2025: Reform donor roundup including Candy, Haidar, Christofferson, R20/Tchenguiz and Greybull.
- Financial Times — JCB £200,000 Reform donation and matching Conservative donation.
- Financial Times — Jeremy Hosking's Reform funding and ideological political activity.
- Reform UK — current policy platform: digital assets, life sciences, business tax/regulation, manufacturing, net zero, defence and procurement.

- Reform UK — July 2026 procurement proposal favouring British firms and removing social-value requirements.
- Guardian — 22 June 2025: Britannia Card launch with Farage, Zia Yusuf and Nick Candy; policy aimed at wealthy internationally mobile people.

6.6 — Source Register: Ben Delo: Second Crypto Mega-Donor - Independent Confirmation or New Influence?

- Electoral Commission - Q1 2026 donations PDF/data: Ben Peter Delo £2m accepted 14 January and £2m accepted 2 March 2026.
- Electoral Commission - Q1 2026 totals: Reform accepted £9.262m in private donations.
- Reuters - 4 June 2026: crypto investors Delo and Harborne drive Reform fundraising lead.
- Guardian - 8 April 2026: Delo discloses £4m Reform funding, motives, planned UK return, Farage response and wider political support.
- Guardian - 18 March 2026: investigation into Delo's Westminster political base, the Sanctuary, and support across the political right.
- US CFTC - 1 October 2020: charges against BitMEX and founders concerning registration and AML requirements.
- US Department of Justice - 27 March 2025: full and unconditional presidential pardon for Benjamin Delo.
- Reuters - 28 March 2025: Trump pardons BitMEX co-founders; background to 2022 guilty pleas.
- Ben Delo - public philanthropy site: stated priorities including free enquiry, academic freedom, mathematics and neurodiversity.
- Electoral Commission - current guidance on proposed £100,000 annual overseas-voter donation cap.

6.7 — Source Register: Ben Delo: The Network Behind the Money

- Guardian / Hope Not Hate — 18 March 2026 investigation into Ben Delo's Sanctuary network, in-kind support, users, events, associates and political/civic beneficiaries.
- Ben Delo Foundation — Delo's stated philanthropic priorities: free enquiry, maths, neurodiversity and Commonwealth collaboration.
- Companies House — Jeremy Hildreth And Comrades Ltd: active company registered at The Sanctuary, 5–8 The Sanctuary, second floor.
- Companies House — Jeremy Hildreth And Comrades Ltd persons with significant control: Jeremy Hildreth controls 75% or more of shares.
- UK Parliament — Register of Lords' Interests: £170,000 received via Effective Giving from Ben Delo in 2020 in connection with Lord Bird's parliamentary work, plus recorded hospitality.
- Guardian — 8 April 2026: Delo's £4m Reform funding, plan to move back to the UK, political motivation and Sanctuary/Restore links.
- Financial Times — 8 April 2026: Delo's decision to return to Britain to continue funding Reform after overseas-donor restrictions.
- Independent — 8 April 2026: Delo says he will return early, contribute more to Reform's budget and urges other people with deep pockets to help build a war chest.

- Guardian — 25 April 2026: Delo publicly defends Christopher Harborne's role as a Reform donor and urges wealthy supporters to build a Reform war chest.
- Electoral Commission — Political party donations guidance: non-cash benefits and market-value/reporting principles.
- Electoral Commission — Political party donations and loans in Great Britain: definitions and reporting framework.
- Companies House — Civic Future: active UK company used as a reference point for the Sanctuary talent-network connection.
- Sheila Coates Foundation coverage — February 2026: £25m Delo endowment supporting autistic young people.
- London Institute for Mathematical Sciences — March 2026: £20m Delo pledge supporting mathematical science.
- Reuters — Q1 2026 Reform fundraising: Harborne and Delo supplied the majority of Reform's private funding in the quarter.

6.8 — Source Register: Nick Candy: When a Mega-Donor Becomes Part of the Party Machine

- Guardian — February 2025 profile of Reform's inner circle: Candy as treasurer, seven-figure donor and spearhead of the wealthy-donor fundraising drive; Musk trip.
- Financial Times — Reform's Mayfair fundraising dinner targeting former Conservative donors, with tickets up to £25,000 and a £1m+ fundraising expectation.
- The Times — Candy fulfils roughly £1m personal Reform pledge and discusses £25m–£40m fundraising ambition.
- Guardian — December 2025: £490,000 further Candy donation disclosed alongside Harborne's £9m; Candy described as honorary treasurer/former Tory donor.
- Guardian — September 2025: Candy targeting high-net-worth donors in the UK and low-tax jurisdictions; £100,000 Interior Architecture Landscape donation.
- Guardian — April 2026: Candy's property portfolio, approximately £1m Reform donations, Britannia Card launch presence, Musk meeting, Providence House political fundraising use and Farage company at Candy-owned Mayfair offices.
- Reuters — April 2025 profile of Reform's professionalisation and wealthy former-Conservative donor support.
- Share the Wealth — March 2026 donor summary derived from Electoral Commission data, recording Candy at £990,000 in 2025.
- MP Data — Reform UK donation database sourced from Electoral Commission records; Candy entries total approximately £990,000.
- HMRC — April 2025 replacement of the non-dom remittance basis with a residence-based foreign income and gains regime; background relevant to Britannia Card policy.

6.9 — Source Register: Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

- Electoral Commission — Q1 2025 Reform UK donations: primary record including Mohamed Amersi £25,000, Fiona Cottrell £250,000 and other accepted donations.

- Guardian — 29 January 2025: Bassim Haidar and Mohamed Amersi each paid £25,000 to attend the Reform fundraiser organised by Farage and Candy; guest list and donor comments.
- Guardian — 15 February 2025: inside Reform's fundraising operation; Haidar and Amersi described as Tory donors who came through Candy's contact book.
- Financial Times — June 2025: Candy under pressure over donation pledges; £313k personal contribution at that point, Haidar about £250k of £1m pledge, and Candy's international HNW fundraising efforts.
- Financial Times — Q1 2025 analysis: Reform's new cash fundraising was just over £840k after excluding Tice loan conversions.
- Guardian — 4 September 2025: almost £1m from former Tory donors in Q2, including Candy, Haidar, Johan Christofferson and R20; Greybull £100k.
- Guardian — 19 September 2025: donor roundup including Haidar, Christofferson, R20 and Greybull; Candy targeting HNW individuals in UK and low-tax jurisdictions.
- Guardian — 4 December 2025: Harborne £9m, Candy £490k and Haidar £100k; confirms Harborne's Brexit Party funding history predates Candy.
- Guardian — 12 September 2024: Fiona Cottrell £500k Reform donations before Candy became treasurer.
- Guardian — 29 July 2026: reporting that George Cottrell transferred more than $2m to Fiona before major Reform-linked payments, changing the source-of-funds analysis.
- Guardian — 9 July 2026: police investigation into £500,000 of Reform donations registered in Fiona Cottrell's name; no arrests and no wrongdoing established.
- Guardian — 5 March 2026: later Reform donor cohort including David Grainger, Bassim Haidar, Isabel Goldsmith and others.
- Guardian — 4 June 2026: David Grainger becomes a roughly £1m Q1 donor; additional new Reform donors identified.
- Guardian — 8 April 2026: Ben Delo's £4m Reform donations and independent Westminster political ecosystem.
- Spectator — February 2026: Reform fundraising team described as led by Candy and Charlton Edwards; donor categories include Tory switchers, cross-party donors and new political donors.

6.10 — Source Register: Bassim Haidar: The Candy Conversion Case

- Guardian — 2 May 2024: Haidar says abolition of non-dom status would cost him millions annually, announces plans to leave for Monaco/Dubai, and describes a 29-person non-dom working group.
- Financial Times — 29 January 2025: Haidar and Amersi pay £25,000 for top-table seats at Reform's Candy/Farage Mayfair fundraiser; Haidar discusses Reform as an alternative after the non-dom crackdown.
- Guardian — 29 January 2025: Haidar and Amersi at Reform fundraiser organised by Farage and Candy.
- Guardian — 15 February 2025: Haidar and Amersi described as Tory donors who came through Nick Candy's contact book.

- LBC — 27 April 2025: Haidar's £1m Reform pledge; >£700k prior Tory support; comments on pro-business policy, immigration, non-dom reform, £200k flat-tax proposal and expectation Farage may create a new non-dom regime.
- Financial Times — June 2025: only about £250k of Haidar's £1m pledge had then materialised; Candy fundraising context.
- Guardian — 19 September 2025: Reform donor roundup reporting Haidar at £225k in the then-published donation data.
- Guardian — 4 December 2025: further £100k Haidar donation alongside Harborne/Candy funding.
- DeSmog — 26 January 2026: Haidar funded approximately £55k of Farage/staff flights to a November 2025 US veterans event; 2025 Reform cash support described as £355k.
- OpenLobbying — parliamentary-register extraction: £54,921.02 Haidar-funded flights for Farage and two staff, 6–9 November 2025.
- Financial Times — June 2026: Q1 2026 Reform funding, including £150k from Haidar in the quarter.
- MP Data — Electoral Commission-derived Reform donation records, including Haidar name variants and transaction dates.
- World Economic Forum — Bassim Haidar biography: Channel IT, Channel VAS, African/Middle East business background.
- BH Holdings — Haidar's official business biography and portfolio: telecoms, fintech, logistics, energy, venture capital and medicinal cannabis.
- Reform / Britannia Card policy site — proposed £250,000 contribution, ten-year renewable residence and preferential foreign-income/gains treatment.

6.11 — Source Register: Fiona and George Cottrell: Following the Money Behind the Registered Donor

- Guardian — 29 July 2026: George Cottrell reportedly transferred more than $2m to Fiona before major Reform-related payments; banking-source evidence and source-of-funds questioning.
- Guardian — 9 July 2026: Met investigation into Fiona's two £250k May 2024 Reform donations; Electoral Commission referral; section 61 concealment issue; no arrests.
- Guardian — 10 July 2026: George and Fiona understood to have been interviewed under caution; inquiry described as broader; June BMB route and Tice response.
- Guardian — 8 July 2026: detailed reconstruction of Fiona's payment to Britain Means Business and Reform's 2024 cash pressure.
- Guardian — 8 July 2026: multiple Reform-related transactions reported to the NCA by bankers, including Fiona/George/Tice-related flows.
- Financial Times — 5 August 2026: Fiona's £1.075m BMB payment; same-day £500k Reform donation and £200k Tisun-related loan repayment; wider Tice/Reform loan accounting.
- Financial Times — July 2026: Reform bank account frozen during 2024 election while compliance checks were conducted; separate context for campaign finance scrutiny.
- Financial Times — 8 August 2026: Farage and Tice sue NCA over alleged banking leaks; distinguishes confidentiality litigation from underlying transaction questions.
- Electoral Commission — searchable political-finance register and 2024 party-funding data.

- Electoral Commission — 2024 donations overview and reporting caveats.
- Legislation.gov.uk — Political Parties, Elections and Referendums Act 2000, including section 61.

6.12 — Source Register: Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

- Electoral Commission — Reform UK financial scheme (released under FOI): A'zami's party-wide responsibilities for donations, loans, accounting, campaign expenditure and compliance.
- Electoral Commission — Political party donations and loans in Great Britain: registered treasurer responsibilities, accounting records, permissibility and reporting.
- Electoral Commission — Pre-poll donations/loans guidance: treasurer remains responsible and certifies completeness/correctness during UK general elections.
- Electoral Commission FOI 012-25 — confirms A'zami was Reform's registered treasurer and that the Commission sought clarification over four donations connected with the frozen bank account.
- Companies House — Reform 2025 Ltd / old Reform company officer record: A'zami served as company secretary until 19 February 2025.
- Financial Times — 26 July 2026: Reform's bank account frozen for about two weeks during the 2024 election; A'zami unable initially to return an impermissible donation; EC confirms correspondence.
- Financial Times — 5 August 2026: Tisun repayment/reclassification chronology; Fiona Cottrell/BMB same-day transactions; A'zami says he was unaware of later conversions and repayments.
- Sunday Times — 1 August 2026: reporting on Farage's pre-election return discussions, Tice repayment arrangement, A'zami departure and Reform's response that A'zami had complete oversight.
- Guardian — 8 July 2026: Reform financial flows, Britain Means Business and banking/NCA scrutiny.
- Commons Library — 15 April 2026: know-your-donor requirements, true-donor identification and proposals for stronger political-finance checks.
- Reuters — 22 May 2019: Electoral Commission review of the Brexit Party's fundraising systems following funding concerns.
- Financial Times — 18 June 2019: watchdog told Brexit Party to review donations and strengthen donor verification.
- Electoral Commission — 2022 Reform accounts/financial material recording substantial Tice-related director loan dependence.
- Electoral Commission FOI 061-25 — Reform constitutions/financial schemes, including leader appointment of treasurer and treasurer responsibility for financial reporting/probity.

6.13 — Source Register: Richard Tice: Leader, Lender, Company Controller and Related-Party Risk

- Financial Times — 5 August 2026: £1.075m Fiona Cottrell payment to BMB; £500k BMB Reform funding; same-day £200k Tice-related repayment; later Tisun loan reclassifications and A'zami account.
- Guardian — 8 July 2026: BMB/Cottrell/Tice financial flows, SAR reporting, George Cottrell loan and wider Reform finance scrutiny.
- Guardian — 9 July 2026: questions over BMB source of funds and Tice's reported £80,000 personal bridging loan from George Cottrell.
- Guardian — 29 July 2026: reported George-to-Fiona transfers preceding Fiona's Reform/BMB payments.
- ITV News — 26 July 2026: Metropolitan Police investigation into two £250,000 BMB donations to Reform.
- Guardian — 3 August 2026: Farage acknowledges earlier discussions with Tice/Cottrell about returning as Reform leader.
- Companies House — Britain Means Business Ltd officers: Tice active director; company no. 10893794.
- Companies House — Britain Means Business Ltd persons with significant control: Tice controls 75% or more of voting rights.
- Companies House — Tisun Investments Ltd filing history and 2024 accounts.
- Electoral Commission — Political Finance Online: donations, loans and party accounts.
- Electoral Commission — donations and loans reporting framework.

Part VI — Supplementary section-end evidential summaries

These section-end summaries supplement the cumulative Part VI synthesis. They are retained here so readers can inspect the narrower evidential conclusions from individual sections.

6.7 Ben Delo: The Network Behind the Money

24. What the Evidence Supports

- Delo built a Westminster political/civic network before becoming a Reform mega-donor.
- The Sanctuary provides valuable in-kind infrastructure including office, event and media-production capacity.
- The network has supported or hosted actors associated with Reform, Restore Britain, Advance UK, Conservatives and non-party organisations.
- Delo's political-cultural objective around free speech and changing institutional culture is publicly documented.
- His Reform donations are consistent with a broader pre-existing ideological trajectory rather than appearing from nowhere.
- Delo actively wants Reform to acquire enough resources to become a party of government and has encouraged other wealthy supporters to help build its war chest.
- Jeremy Hildreth and the Sanctuary are legitimate network nodes for further investigation.

- Delo's history of cross-spectrum and non-political philanthropy makes it inaccurate to characterise all of his giving as hidden Reform expenditure.

25. What the Evidence Does Not Support

- That the Sanctuary is a secret Reform headquarters.
- That every group using the Sanctuary endorses Delo or is controlled by him.
- That Delo endorses every statement made by people he funds or hosts.
- That free Sanctuary space given to Rupert Lowe has been established as an unlawful undeclared political donation.
- That Delo and Harborne coordinate their donations or policies.
- That Delo controls Reform policy through James Orr or any other policy figure.
- That Triggernometry, Civic Future, the Academy of Ideas or other users are fronts for Reform.
- That Delo's maths, autism or other charitable giving is disguised party-political spending.

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6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

29. What the Evidence Supports

- A'zami was the registered treasurer in 2024 and formally carried extensive legal and internal responsibility for Reform's financial compliance.
- Reform's financial scheme centralised party financial control in the registered treasurer.
- Tice simultaneously occupied several financially relevant roles, including political leader, major lender and controller of companies interacting financially with Reform.
- Reform's bank account was frozen for about two weeks during the 2024 election while its bank carried out compliance checks.
- The Electoral Commission sought clarification from A'zami about four donations associated with that freeze.
- At least one impermissible donation had to be returned, with the freeze temporarily preventing return.

- Historic Tisun loans were later partly converted into donations rather than repaid in cash.
- A'zami says he was not told about material later reclassifications; Reform says he had complete oversight.
- Those competing accounts raise a real question about the practical effectiveness of the party's formal control system.

30. What the Evidence Does Not Support

- That A'zami personally committed an electoral offence.
- That the bank froze Reform's account because of the Cottrell transactions.
- That a frozen account itself establishes suspicious or criminal activity by the party.
- That Britain Means Business was an unlawful pass-through vehicle.
- That Tice's loan conversions were inherently unlawful.
- That Candy was the statutory registered treasurer merely because Reform called him treasurer/honorary treasurer.
- That A'zami's departure proves he was forced out for raising compliance concerns.
- That every reporting error reflects deliberate concealment rather than clerical or systems failure.

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- That every reporting error reflects deliberate concealment rather than clerical or systems failure.

Part VI — Supplementary causal-inference cautions

These methodological cautions supplement the Part VI Evidential Standard. They are retained because they explain how donor facts, relationships and policy intersections should — and should not — be interpreted.

6.1 From Donation to Influence: The Evidence Test

High donor concentration does not prove policy capture. It does increase the importance of governance questions: what access exists, how conflicts are managed, whether the party could realistically reject a donor's wishes, and whether policy development is insulated from funding dependence.

6.1 From Donation to Influence: The Evidence Test

That does not establish the motive for the gift. It does make the precise chronology of gift, political discussions, leadership decision and subsequent policy development an appropriate subject for evidential reconstruction.

6.2 Christopher Harborne: The Chronology Test

But it demonstrates precisely why this report uses an evidence ladder. Travel with a former prime minister plus defence investments establishes access and commercial interest. It does not establish that Harborne secured a defence contract, influenced Ukraine policy or received preferential treatment.

6.2 Christopher Harborne: The Chronology Test

It still does not establish that QinetiQ is an incumbent immigration-detention operator or that Reform intends to award it work under Operation Restoring Justice.

6.3 Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?

Temporal sequence alone cannot establish a bargain. But unlike the QinetiQ/Brexit theory, there is no sequencing problem here: the record donation precedes a documented intervention on policy relevant to Harborne's sector.

6.3 Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?

The unresolved issue is whether "nothing in return" means there were no policy conversations at all, or simply that no donation was conditional on a particular outcome. Those are different propositions and the public evidence reviewed here does not resolve them.

6.3 Christopher Harborne, Crypto and Reform Policy: Alignment or Influence?

The fact of removal does not establish why it was removed. Websites change, policy documents are revised and legislation can be superseded.

6.4 Christopher Harborne, Tax and the Britannia Card: Who Would Benefit?

That observation is not evidence of motive. It simply explains why donor-policy intersection analysis is appropriate.

6.6 Ben Delo: Second Crypto Mega-Donor - Independent Confirmation or New Influence?

This history makes his views on financial regulation particularly relevant if he gains access to Reform policy-makers. It does not itself show that he seeks weaker anti-money-laundering rules in Britain.

6.7 Ben Delo: The Network Behind the Money

But attendance at a large social event is weak evidence on its own. It does not establish that Orr discussed policy with Delo, that Delo briefed him or that Reform adopted proposals because of the relationship.

6.7 Ben Delo: The Network Behind the Money

That is not proof of a secret master plan. It is evidence that at least part of his giving is consciously aimed at shifting the intellectual and institutional environment.

6.8 Nick Candy: When a Mega-Donor Becomes Part of the Party Machine

But historical tax residence is not evidence of present avoidance, wrongdoing or eligibility for the Britannia Card.

6.8 Nick Candy: When a Mega-Donor Becomes Part of the Party Machine

The existence of a winding-up petition does not make the donation impermissible and does not prove wrongdoing by Candy or Reform.

6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

This is therefore a documented Candy-era conversion, but a limited one: the public record reviewed here does not show Amersi subsequently becoming a Reform mega-donor.

6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

The chronology does not prove Candy alone persuaded Haidar — Farage, Reform's polling rise and policy platform were obvious independent attractions — but it establishes something much stronger than coincidence: Candy organised the high-value event at which an existing Tory donor was actively courted, and that donor then switched allegiance and became a repeat Reform financier.

6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

One case cannot establish a general pattern, but it validates the recruitment model Candy claimed to be operating.

6.9 Following Candy's Money Network: Who Did the Treasurer Actually Bring In?

He paid for top-level access and spoke positively about the event, but the public record reviewed here does not show a comparable subsequent financial migration to Reform.

6.10 Bassim Haidar: The Candy Conversion Case

It does not prove Haidar knew the Britannia Card was coming, still less that he designed it.

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

Political-finance records identify the person or entity from whom a regulated donation was accepted. That is essential, but it does not automatically answer every economic-source question.

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

That description does not prove she lacked sufficient assets. It explains why investigators and journalists focused on the economic origin of the funds rather than simply accepting social background as an explanation.

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

It still does not establish that George was legally the donor of the May political donations. That is exactly the question the authorities must determine.

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

This does not prove Fiona's money funded the loan repayment or that any transaction was unlawful. Money in corporate accounts is fungible, and the precise banking ledger and contractual arrangements would be needed to trace economic use.

6.11 Fiona and George Cottrell: Following the Money Behind the Registered Donor

That establishes political utility. It does not establish that the source or routing was unlawful.

6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

Conversely, a suspicious activity report does not establish that a donation is impermissible under electoral law.

6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

Overlap does not prove misconduct. It increases the value of independent sign-off and written audit trails.

6.12 Who Was Watching the Money? Reform's Treasurers, Controls and 2024 Financial Governance

Those reports do not establish that he resigned because of wrongdoing by others, and the chapter should not imply such a causal conclusion without his own contemporaneous resignation account.

6.13 Richard Tice: Leader, Lender, Company Controller and Related-Party Risk

The police inquiry does not establish that Tice, Britain Means Business or Reform committed an offence.

6.13 Richard Tice: Leader, Lender, Company Controller and Related-Party Risk

The public evidence reviewed here does not establish that the loan was political, preferential or improperly undeclared.

6.13 Richard Tice: Leader, Lender, Company Controller and Related-Party Risk

The current public record justifies investigating the agreement; it does not establish that Tice sold the leadership or that Farage bought it.

Part VII — Preparing for Government

Section-level source registers, further research questions and supplementary evidential material supporting Part VII.

7.1 — Source Register: Who Actually Makes Reform UK Policy?

- Reform UK — current party website: James Orr listed as Head of Policy; Zia Yusuf as Shadow Home Secretary; current senior team.
- Reform UK — Policies page: current policy portal and James Orr identification.
- Reform UK — 30 June 2026: Zia Yusuf says Reform plans "thousands of pages of primary legislation" and aims to be the "most prepared incoming government".
- The Spectator — 17 February 2026: James Orr appointed Head of Policy, succeeding Zia Yusuf; Orr describes working alongside Danny Kruger.
- Reform UK conference resolution — adoption of 2024 constitution and member/branch governance reforms.
- Financial Times — Reform constitutional democratisation: member rights to debate/agree policy and remove leader.
- Preparing for Government — Danny Kruger: "Restoring Government", 28 October 2025.
- Lawyers for Reform — launch at the Law Society; Danny Kruger participates as head of Preparing for Government.
- Financial Times — Centre for a Better Britain and policy/constitutional work associated with preparations for a Reform government.
- Guardian — 29 March 2026: farming adviser Clive Bailye; Reform says he is one of several contributors and final policy is determined through formal processes led by James Orr.
- Reuters — 17 March 2026: Reform policy agenda and James Orr's role within the party's developing governing project.

7.2 — Source Register: The Policy-Making Chain: Orr, Kruger, Farage, the Party Board and the External Network

- Reform UK Constitution 2025 — clauses 7.2 and 7.3: Leader advisory groups, appointments and authority to make/approve national policy statements.
- Reform UK — 2024 conference resolution adopting the constitution and describing member/branch democratisation.
- Reform UK — current senior team: James Orr, Head of Policy; Zia Yusuf, Shadow Home Secretary; current portfolio structure.

- Preparing for Government — homepage: recruitment of external expertise, civil servant survey and published government-reform work.
- Danny Kruger — Restoring Government, 28 October 2025: readiness, appointments, outside expertise and institutional programme.
- Danny Kruger — Fixing the Centre, 24 May 2026: Cabinet Office/Cabinet Secretary abolition, ministerial control and external recruitment proposals.
- Danny Kruger — Storm and Sunshine, 15 December 2025: civil-service headcount and reform programme.
- Institute for Government — Preparing for government: lessons for oppositions transitioning into power.
- Lawyers for Reform — mission: special-interest group within Reform UK contributing to the legal underpinning of party policies.
- Lawyers for Reform — March 2026 launch with Danny Kruger and Richard Tice.
- Centre for a Better Britain — mission, modelling/peer review, policy development and preparation for future government.
- Financial Times — September 2024: Reform constitution, member policy rights and transition away from shareholder ownership.

7.3 — Source Register: Policy Case Studies: Announcement First or Assurance First?

- Reform UK — current policies: Operation Restoring Justice, 24,000 removal-centre places, up to five flights per day and claimed £42bn ten-year net saving.
- Reform UK — 15 June 2026: Employers' Migrant Labour Levy and £11.2bn employer-NIC tax-cut costing/funding claim.
- Reform UK — 3 August 2026: Operation Fortress; interception/return policy and stated approach if France refuses cooperation.
- Reuters — 3 August 2026: Operation Fortress announcement and expert criticism concerning French territorial waters and consent.
- Chartered Institute of Taxation — June 2024: summary of Reform's roughly £90bn election tax-cut programme.
- Chartered Institute of Taxation — Election 2024 Challenge: Reform had not replied to CIOT questions by final update.
- Chartered Institute of Taxation — 7 November 2025: Reform drops commitment to tax cuts on the 2024 scale; Farage says such substantial cuts are not realistic at present.
- Reuters — 18 February 2026: Reform/Jenrick fiscal reset, OBR/BoE position, welfare savings and fiscal-discipline framing.

7.4 — Source Register: The "Thousands of Pages" Test: Where Is the Draft Legislation?

- Reform UK — 30 June 2026: Yusuf says Reform will have "thousands of pages of primary legislation ready to go" in its first year.
- Reform UK — current policy portal: names the Illegal Migration (Mass Deportation) Bill and describes Operation Restoring Justice.

- UK Government — Guide to Making Legislation 2025: bill teams, drafting instructions, Parliamentary Counsel and preparation requirements.

7.5 — Source Register: Who Are the Drafters? Mapping Reform's Legislative-Preparation Network

- Reform UK — current national website and policies portal: James Orr identified as Head of Policy.
- Reform UK — July 2026 and other Preparing for Government material: Danny Kruger identified as Head of Preparation for Government.
- Lawyers for Reform — official website: special-interest group within Reform UK; mission includes contributing to the legal underpinning of Reform policy; officers include David Jones, Martin Howe KC, Gary Wood, Laura Bailhache, Benjamin Wrench and Tim Briggs.
- Law Society Gazette — 25 March 2026: report on launch of Lawyers for Reform and mobilisation of legal supporters.
- Centre for a Better Britain — official mission and "How We Work" material: policy development, institutional focus and claim of political independence.
- Sunday Times — 21 June 2025: report that the Centre for a Better Britain planned policy development, draft legislation, polling and candidate preparation. [Bibliographic citation retained; a stable direct public URL was not recovered in this publication pass.]
- Financial Times — 6 September 2025: report on Centre for a Better Britain plans for constitutional and legal change. [Bibliographic citation retained; a stable direct public URL was not recovered in this publication pass.]
- UK Parliament — 2026 Reform-sponsored amendments cited in 7.4: evidence of clause-level parliamentary activity, while individual text authorship is not normally identified in the amendment record.

Further Evidence That Could Strengthen or Change the Assessment: 7.7

- Identify any Reform publication setting out a first-year or first-100-days Bill schedule.
- Classify major Reform commitments by likely need for primary legislation, secondary legislation, executive action or international agreement.
- Estimate which flagship measures are mutually dependent and which could proceed in parallel.
- Test the implementation burden behind the largest Bills: staffing, procurement, data, estates, regulations and commencement.
- Compare the proposed programme with recent incoming governments' first legislative sessions without treating historical averages as hard capacity limits.

7.6 — Source Register: Can the First-Year Legislative Programme Actually Pass?

- Cabinet Office — Guide to Making Legislation (updated 10 September 2025): government legislative programme, Bill preparation, Parliamentary Counsel, passage and Royal Assent.
- House of Commons Library — Carry-over of public bills (14 May 2026): purpose and operation of carry-over between parliamentary sessions.
- UK Parliament — MPs' Guide to Procedure: carrying government Bills over to another session and the normal 12-month limit from First Reading.

- Reform UK — current policy platform: Illegal Migration (Mass Deportation) Bill, Human Rights Act repeal, detention/removal architecture and related first-government commitments.

Further Evidence That Could Strengthen or Change the Assessment: 7.8

- Build a dependency map for the largest flagship commitments and identify shared bottlenecks.
- Quantify the current baseline for detention, removals and relevant staffing before testing Reform's ramp-up assumptions.
- Search for published implementation plans, impact assessments, procurement assumptions and workforce models.
- Identify commitments dependent on foreign-government agreement and distinguish negotiated from assumed cooperation.
- Test whether Reform's proposed machinery-of-government changes create transition dependencies that conflict with rapid first-year delivery.

7.7 — Source Register: From Legislation to Implementation: Can the State Do What the Bill Says?

- Cabinet Office — Guide to Making Legislation 2025: resourcing Bill teams; policy/legal capacity; delegated legislation; post-Royal-Assent work.
- Institute for Government — Driving delivery (2025): implementation monitoring and ministerial delivery discipline.
- Institute for Government — International Delivery: implementation planning, central coordination, major-project assurance and evaluation.
- Institute for Government — Reshaping government: risks and costs associated with rushed machinery-of-government restructuring.
- Reform UK — current immigration/removals and government-reform policy material examined elsewhere in Part VII.

7.8 — Source Register: Part VII Synthesis: How Ready Is Reform to Govern?

- Reform UK — Preparing for Government programme and published government-reform papers.
- Reform UK — Zia Yusuf, 30 June 2026: claim of "thousands of pages of primary legislation ready to go in that first year".
- Institute for Government — Preparing for government: How the official opposition should ready itself for power (2024).
- Institute for Government — Preparation for government by opposition parties or leadership challengers (19 June 2026).
- Evidence and sources assembled in Sections 7.1–7.7 of this report. [Internal cross-reference to the preceding section registers; no external URL.]

Publication note

Parts VI–VII — Further research questions

The following questions identify evidence that could strengthen, weaken or materially change assessments in Parts VI–VII. They are retained as a transparent record of unresolved evidential tests, not as conclusions.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: the relevant section

- Obtain the most precise available dates/tranches for the £5 million Harborne transfer.
- Reconstruct Farage–Tice–Cottrell leadership discussions from March to June 2024.
- Search for contemporaneous Harborne communications concerning Farage's return.
- Build a dated history of Farage/Reform crypto policy and compare it with Harborne's funding.
- Build a dated history of Reform defence/security procurement policy from 2024 onward.
- Search QinetiQ lobbying, political-contact and procurement disclosures for Reform-linked names.
- Map Harborne's other defence-company interests rather than treating QinetiQ as the only relevant asset.
- Compare Harborne's Conservative/Johnson access with his Farage access to identify whether his behaviour is party-specific or network-wide.
- Monitor future procurement notices for bidder participation by Harborne-linked interests.
- Preserve negative findings and alternative explanations in the same evidence table as supportive findings.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.3

- Recover and archive the original Reform Cryptoassets and Digital Finance Bill.
- Identify its authors and external advisers.
- Build a Farage crypto-statement chronology from 2020 to 2026.
- Separate CBDC opposition, bitcoin policy, stablecoin regulation, tax policy and political-donation policy rather than treating "crypto" as one issue.
- Obtain or challenge the withholding of the Bank of England meeting record through available transparency routes.
- Date the Tice correspondence requesting the Bailey meeting against the £9m donation commitment and acceptance dates.
- Map DCGG personnel and organisations against Harborne, Tether and Reform contacts.
- Assess whether the proposed 10% crypto CGT rate would benefit Harborne personally under his actual tax residence/status, rather than assuming it would.
- Track any replacement Reform crypto bill and compare it with the May 2025 text.
- Examine the separate Britannia Card/non-dom proposal because tax-residence policy may provide a different route of potential donor benefit.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.4

- Locate the original Britannia Card policy-development team and authors.
- Identify any external tax advisers or wealthy-person consultations before 23 June 2025.
- Search Harborne interviews and correspondence for views on non-dom abolition and UK tax residence.
- Clarify Harborne's publicly documentable UK/Thailand residence chronology without speculating about confidential tax returns.
- Compare Britannia Card terms with regimes in Italy, Switzerland, UAE and other jurisdictions Reform cited as competitors.
- Model the card under several generic wealth/income scenarios rather than attributing hypothetical savings to Harborne.
- Track any revised Britannia Card proposal after 2025 and preserve archived versions.
- Analyse whether Reform's later inheritance-tax policy overlaps with the card or creates double benefits.
- Examine Ben Delo and other overseas-based Reform donors as comparative cases.
- Test final donation-law reforms against Britannia Card residence rules if both become legislative proposals.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.6

- Obtain the most complete current picture of Delo's holdings and continuing economic interest in BitMEX or other crypto businesses.
- Map all disclosed Delo political donations and support in kind, not just Reform.
- Create a Sanctuary event/occupant chronology and identify Reform participants.
- Compare Reform policy immediately before and after 14 January 2026.
- Search for Delo meetings with Farage, Tice, Yusuf, Candy and Reform policy staff.
- Examine whether Delo supported or advised campaigns against the Online Safety Act and compare with Reform policy.
- Preserve Delo's April 2026 Telegraph explanation of his motives as primary evidence of stated intent.
- Track whether his planned return to Britain occurred and how the final overseas-donor rules applied.
- Check whether any Delo-linked organisation submits evidence to UK crypto/financial regulatory consultations.
- Keep Harborne and Delo separate analytically unless evidence of coordination emerges.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.8

- Build a Candy-linked donor conversion table from December 2024 onward.
- Recover guest lists for Oswald's and other high-value Reform fundraising events.
- Identify all publicly documented Candy introductions between Farage and prospective donors.

- Search Candy/Harborne and Candy/Delo contacts rather than assuming recruitment.
- Map Candy property/company interests against Reform planning, housing, stamp-duty, non-dom and investment policies.
- Identify whether Candy participated in Britannia Card drafting or merely its launch.
- Clarify the legal and internal meaning of "honorary treasurer" within Reform.
- Examine Reform donor due-diligence procedures and who signs off large donations.
- Determine the terms of Farage's company occupancy at Candy-owned Mayfair offices.
- Track in-kind hospitality, venue use and services supplied by Candy or Candy-controlled entities.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.9

- Obtain or reconstruct the full January 2025 Oswald's guest list and match every attendee against subsequent Electoral Commission records.
- Repeat the exercise for every later Candy-led fundraiser.
- Search each major 2025–26 donor alongside Candy, Charlton Edwards and Farage separately to identify the true recruitment node.
- Build a dated donor-conversion database: first contact, first event, pledge, first accepted donation, repeat donations and policy meetings.
- Investigate Bassim Haidar as the strongest Candy conversion case, including subsequent access to Farage and policy officials.
- Determine whether Mohamed Amersi made any later Reform donations or provided non-cash support.
- Seek direct evidence for or against Candy involvement with David Grainger.
- Search Candy links to Johan Christofferson, Robert Tchenguiz/R20, Greybull and Bamford using corporate and social-event records.
- Identify the role of Charlton Edwards in donors arriving from late 2025 onward.
- Separate donor recruitment from donor servicing: the person who brings a donor in may not be the person who subsequently gives them political access.
- Reconstruct the Fiona/George Cottrell source-of-funds chain separately before using Fiona as an independent donor node.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.10

- Reconstruct every Haidar–Candy–Farage contact between 28 January and 23 June 2025.
- Search Reform speeches, podcasts and interviews for Britannia/non-dom hints before the formal launch.
- Identify the authors and external advisers behind the Britannia Card.
- Search for Haidar's 29-person non-dom working group and any members later linked to Reform donations.
- Obtain the most authoritative Electoral Commission transaction list for all Haidar name variants and reconcile the total.
- Track Haidar donations through Q2/Q3/Q4 2026 to determine whether the £1m pledge is ultimately fulfilled.

- Identify whether Haidar has funded Reform directly in-kind beyond party cash and the declared Farage flights.
- Examine the purpose and attendee list of the November 2025 US trip and whether political/fundraising meetings occurred alongside the declared charity event.
- Map Haidar's UK property and investment exposure only to the extent necessary to test policy conflicts; avoid speculative valuation.
- Search Haidar's fintech and medicinal-cannabis interests against subsequent granular Reform policy changes.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.11

- Build the exact George→Fiona transfer chronology from the July 29 banking-record reporting.
- Reconcile the Guardian's ~£1m and FT's £1.075m Britain Means Business figures and exact dates.
- Trace the two May £250k Reform donations against Fiona's account balances immediately before and after reported George transfers.
- Reconstruct Britain Means Business's June 10 ledger, including the £500k Reform payment and £200k Tisun-related repayment.
- Retrieve Companies House accounts/filings for Britain Means Business and Tisun Investments covering the relevant periods.
- Identify Reform's registered treasurer and responsible officers at each May/June transaction date.
- Examine what due diligence Reform documented for Fiona and BMB.
- Track the Metropolitan Police investigation and any Electoral Commission public findings.
- Separate the NCA leak litigation from the merits of the underlying source-of-funds questions.
- Map every other reported George-funded Reform/Farage expense to determine whether a broader informal financing pattern is independently evidenced.

PART VI — Further Evidence That Could Strengthen or Change the Assessment: 6.12

- Identify the exact registered-treasurer succession date after A'zami and reconcile it with Candy's honorary title.
- Obtain every public Electoral Commission amendment to Reform's 2024–25 loan/donation database and identify what changed.
- Reconstruct all Tisun loan agreements, repayments, conversions and reporting references from 2021 to April 2025.
- Retrieve Britain Means Business and Tisun accounts/filings and reconcile them to Electoral Commission data.
- Search for A'zami interviews, statements or legal filings giving a fuller account of his 2024–25 knowledge.
- Determine whether Reform's independent auditor identified control weaknesses in the 2024 annual accounts or campaign return.

- Identify who controlled Reform's online banking and who held payment authorisation rights in June–July 2024.
- Determine which officer carried out source-of-funds review on Fiona Cottrell and BMB and what information was requested.
- Track the outcome of the Met investigation and any Electoral Commission enforcement action.
- Compare Reform's current post-2025 financial scheme with the 2024 scheme to see whether controls were strengthened after A'zami's departure.

PART VI — Further Evidence That Could Strengthen or Change the Assessment

- Obtain and reconcile the Tisun loan agreements, repayment schedule and conversion documents.
- Obtain BMB's June 2024 ledger/bank chronology and corporate accounting treatment.
- Identify independent approvals for all Tice-related Reform transactions.
- Track the Met investigation into BMB and any Parliamentary Commissioner finding concerning Tice.
- Resolve the terms and disclosure status of the £80,000 George Cottrell loan.
- Locate any documentary record tying — or explicitly separating — the Farage leadership transition from Tice debt resolution.

PART VII — Further Evidence That Could Strengthen or Change the Assessment: 7.2

- Obtain the current Reform constitution in full and identify every clause governing policy, member motions, the Party Board and leader authority.
- Map James Orr's appointment, remit, staff and identifiable policy outputs.
- Map Danny Kruger's Preparing for Government structure, contributors and published work.
- Identify all current shadow/spokesperson roles and distinguish MPs, peers, devolved representatives and unelected appointees.
- Find documentary evidence of fiscal-costing procedures and who signs them off.
- Find documentary evidence of legal review and the claimed "thousands of pages" of draft primary legislation.
- Identify formal links, if any, between Reform and Centre for a Better Britain, Lawyers for Reform and other external policy networks.
- Select 3–4 policy case studies where authorship/process can be reconstructed from announcement backwards.

PART VII — Further Evidence That Could Strengthen or Change the Assessment: 7.3

- Choose a small set of major Reform policies and reconstruct authorship, announcement, costing, legal review and later revision.
- Find named economists, lawyers or specialists publicly credited with challenging — not merely supporting — proposals.
- Test Kruger's claim that future plans will be fully costed against published policy papers.

- Compare the date of political announcements with the date detailed implementation/legal material appeared.
- Identify examples where Reform changed or withdrew policy after internal or external challenge.
- Look for Board minutes, conference motions or constitutional mechanisms showing collective policy approval in practice.
- Investigate whether policy advisers and external contributors publish conflict declarations.
- Separate policy-generation networks from donor networks unless documentary evidence connects them.

PART VII — Further Evidence That Could Strengthen or Change the Assessment: 7.4

- Investigate the claimed draft-legislation programme: what bills have been named, who is drafting them and what has actually been published.
- Identify Reform policies that were changed BEFORE launch because of internal expert challenge, if such examples are public.
- Map the Centre for a Better Britain working groups and their personnel, outputs and relationship to Reform policy adoption.
- Test whether Reform has a standard costing template or policy-paper format across portfolios.
- Look for formal impact assessments, equality analyses, implementation plans and legal compatibility notes.
- Compare Reform's published assurance material with the preparation practices recommended for oppositions approaching government.

PART VII — Further Evidence That Could Strengthen or Change the Assessment: 7.5

- Identify who is actually doing the legal drafting: internal staff, barristers, solicitors, academics, parliamentary staff or external organisations.
- Seek public statements from Lawyers for Reform members describing specific policy/drafting work.
- Map every named Reform Bill or Act and assign a documentary-status score: slogan / policy paper / drafting instructions / clauses / complete draft.
- Investigate whether Centre for a Better Britain outputs feed directly into legislative instructions.
- Look for impact assessments, ECHR compatibility analysis, delegated-powers analysis or explanatory notes attached to any Reform proposal.
- Examine whether Reform's proposed first-year programme is realistically capable of parliamentary passage even if the Bills are pre-drafted.

UK Parliament — written answer HL16246, answered 23 April 2026: government Bill drafting requires legal and policy officials, shared Parliamentary Counsel resource and a dedicated Bill manager; resource varies by Bill size and complexity.

- UK Parliament — Sentencing Act 2026 amendment NC38, led by Nigel Farage and sponsored by Reform MPs, proposing abolition of the Sentencing Council.
- UK Parliament — Sentencing Act 2026 amendment 11, led by Nigel Farage and sponsored by Reform MPs.
- UK Parliament — Sentencing Act 2026 amendment 9, sponsored by Reform MPs and others.
- Community — 24 February 2026 response recording Richard Tice's announcement of a Great Repeal Bill targeting employment and rental reforms.
- Guardian — 24 February 2026 live report quoting Tice's Great Repeal Bill proposal across net zero, ZEV, employment and rental rules.
- Lawyers for Reform — organisation mission and role in contributing to the legal underpinning of Reform policy.
- Preparing for Government — Reform-linked government-preparation programme and published institutional work.

PART VII — Further Evidence That Could Strengthen or Change the Assessment: 7.6

- Build a bill-by-bill register of every Reform proposal that explicitly requires primary legislation.
- Identify any public statements by Lawyers for Reform officers describing work on named policies or draft clauses.
- Search parliamentary staffing records, registers and published acknowledgements for legal or legislative staff attached to Reform MPs.
- Map Centre for a Better Britain papers to later Reform announcements to test whether external work visibly migrates into party policy.
- Look for any evidence of internal review gates: legal sign-off, fiscal sign-off, implementation review or leadership approval before launch.
- Test the claimed first-year legislative programme against parliamentary time, sequencing and House of Lords constraints.